VALE OF GLAMORGAN

REPLACEMENT LOCAL DEVELOPMENT PLAN

2021 - 2036

Volume 3 – Full Representations on the Policy Framework (Excluding Key Sites and Housing Allocations)

August 2026 (Updated October 2026)



RLDP CDLN

VALE of GLAMORGAN BRO MORGANNWG

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Introduction to Representations Register

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

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 It also excludes representations that have been withdrawn.

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

Volume 1 provides a summary of all representations.

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

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

The Volumes are as follows:

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

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

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

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

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

4405 Comment

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mr James Osgood [1383]

Summary:

I live in Gileston and object to the Deposit RLDP unless it provides stronger protection for the setting of the GHC and clearer, place-based approach to development affecting Gileston. While I support RE and economic growth in principle, large-scale or energy-related development should be directed to appropriate brownfield sites such as Aberthaw rather than sensitive greenfield land near the coast. Where SD is proposed in this area, the RLDP should safeguard policy support for long-term transport improvements, including the potential for a future rail station or enhanced rail connectivity serving St Athan on the Barry–Llantwit Major line, supporting sustainable travel.

Full text:

Respondent: Resident of Gileston
Area of Interest: Gileston, St Athan and the Glamorgan Heritage Coast

1. Introduction and Context

I am a resident of Gileston and a regular user of the Glamorgan Heritage Coast, surrounding public rights of way, and the local road network between Gileston and St Athan. My comments relate to the implications of the Deposit Replacement Local Development Plan (RLDP) for the setting of the Glamorgan Heritage Coast, the villages of Gileston and St Athan, and the cumulative impacts of strategic development in this part of the Vale.

I recognise the need for the RLDP to support decarbonisation, renewable energy, and employment growth. However, the Plan must do so in a way that protects nationally important landscapes, avoids inappropriate development in sensitive locations, and ensures that communities hosting strategic development receive tangible infrastructure benefits.

2. Protection of the Glamorgan Heritage Coast and Its Setting

The Glamorgan Heritage Coast is one of the Vale's most valuable environmental and recreational assets and is fundamental to the character, identity and wellbeing of nearby communities, including Gileston. While the Deposit Plan recognises the importance of the Heritage Coast itself, there is insufficient clarity and strength in policy terms regarding the protection of its wider setting, particularly from large-scale or industrial forms of development on adjacent greenfield land.

The RLDP should be strengthened to ensure that development proposals within the setting of the Heritage Coast are subject to a robust presumption against development where landscape character, visual amenity, tranquillity, or public enjoyment would be harmed. Without this clarity, there is a real risk of incremental erosion of the coastal landscape through development that may be justified as "strategic" but is poorly located.

3. Gileston and St Athan – Cumulative and Place-Based Impacts

Gileston is a small rural village with limited services and infrastructure, located adjacent to open countryside and the coast. St Athan, while larger and more developed, already experiences pressure from major employment and infrastructure uses, including the former MOD site and proposed strategic employment and energy uses in the wider area.

The RLDP should do more to assess and respond to the cumulative impacts of development affecting this corridor of the Vale, rather than considering sites in isolation. This includes impacts on landscape, traffic, tranquillity, and the everyday experience of residents and visitors.

4. Strategic Energy Development and Site Selection

I support renewable and low-carbon energy development in principle. However, the RLDP should make clear that such development must be directed to appropriate locations, with a strong preference for previously developed or industrial land. In this part of the Vale, the former Aberthaw Power Station site represents a logical location for energy-related uses, given its industrial character and existing infrastructure.

The Plan should avoid creating policy ambiguity that could be interpreted as support for large-scale energy infrastructure on greenfield land in sensitive coastal or rural locations, particularly within the setting of the Heritage Coast.

5. Infrastructure and Fairness to Host Communities

A key concern for residents of Gileston and St Athan is that strategic development brings limited direct benefit to local communities while generating long-term impacts. The RLDP places significant emphasis on growth and strategic infrastructure, but there is insufficient certainty that villages hosting or neighbouring such development will see meaningful improvements in connectivity or services.

In particular, the Plan should take a more proactive approach to safeguarding and planning for enhanced public transport connectivity in the Barry–Rhoose–Llantwit Major corridor. While the delivery of a new rail station serving St Athan and potentially Gileston would be a long-term and multi-agency undertaking, the RLDP could play a critical role by safeguarding land, identifying the corridor as a priority for future rail or rapid transit enhancement, and linking strategic development to long-term transport planning objectives.

Without such forward-looking infrastructure commitments, communities risk bearing the impacts of development without corresponding benefits.

6. Conclusion and Requested Changes

In its current form, I object to the Deposit RLDP insofar as it does not provide sufficient policy protection for the setting of the Glamorgan Heritage Coast, nor does it adequately address cumulative impacts and infrastructure fairness for villages such as Gileston and St Athan.

I would urge the Council to strengthen the Plan by:

Explicitly protecting the setting of the Glamorgan Heritage Coast from inappropriate development

Directing strategic and energy-related development to brownfield and industrial sites wherever possible

Embedding a clearer, place-based approach to cumulative impacts

Committing to long-term transport and infrastructure planning, including safeguarding opportunities for improved rail or high-quality public transport serving St Athan and surrounding communities

Subject to these changes, the RLDP would provide a more balanced and sustainable framework that supports growth while respecting the unique environmental and community assets of this part of the Vale.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

4475 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mrs Lucy Williams O'Connor [2805]

Summary:

The plan will cause a lot of damage to natural wildlife, reduce green land even more and we do not have the infrastructure to support this. Lots of animals use this land and we are losing so much space to houses and families that don't always look after the spaces provided. This town is already so full of houses, there cannot possibly be room for more.

Full text:

The plan will cause a lot of damage to natural wildlife, reduce green land even more and we do not have the infrastructure to support this. Lots of animals use this land and we are losing so much space to houses and families that don't always look after the spaces provided. This town is already so full of houses, there cannot possibly be room for more.

Change suggested by respondent:

To cancel the plan of developing housing. Too much green land is being lost and it is having a detrimental effect on the planet and the world we live in and our community. People are expected to make it to work to provide for families and contribute to the economy, how can we do this when the roads are flooded with traffic. Losing so much green space will also impact wildlife which is another vital factor to the way of human life. How can we keep building houses, surely one day we will run out of room and is it worth getting to that stage?

Sound: No

Attachments: None

4489 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Miss Emily Harris [2816]

Summary:

The population of Rhoose is already too high and does not have the facilities needed to accommodate current residents, let alone the additional residents the plan aims to accommodate. It is impossible to get a doctors appointment, schools are overcrowded and underfunded, public transport is poor and the only road out of the village towards Cardiff and Barry is already too busy in the morning, especially as it is the only road from Rhoose, St Athan, Llantwit and surrounding villages. Traffic will become a nightmare unless NO houses are built. No one in Rhoose supports this.

Full text:

The population of Rhoose is already too high and does not have the facilities needed to accommodate current residents, let alone the additional residents the plan aims to accommodate. It is impossible to get a doctors appointment, schools are overcrowded and underfunded, public transport is poor and the only road out of the village towards Cardiff and Barry is already too busy in the morning, especially as it is the only road from Rhoose, St Athan, Llantwit and surrounding villages. Traffic will become a nightmare unless NO houses are built. No one in Rhoose supports this.

Change suggested by respondent:

Find somewhere other than both Rhoose and St Athan to build houses. Do not build on farms and existing green spaces and spend the money to support the community, rather than adding increased pressure on the community, local facilities and local residents.

Sound: No

Attachments: None

4517 Support

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mr Karl Watkins [2830]

Summary:

I am completely in support of new housing. I often wonder how my children will get on the housing ladder and in particular where.

Full text:

I am completely in support of new housing. I often wonder how my children will get on the housing ladder and in particular where.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

4657 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mr Tim Griffiths [2578]

Summary:

With the stated need for affordable/social housing in Barry it seems to me that these larger developments are only paying lip service to the stated need, the rest from what I see is a commercial/revenue seeking stream for the council

Full text:

With the stated need for affordable/social housing in Barry it seems to me that these larger developments are only paying lip service to the stated need, the rest from what I see is a commercial/revenue seeking stream for the council

Change suggested by respondent:

There is less and less suitable land for housing developments in Barry. Too much is being squeezed into an already overdeveloped area

Sound: No

Attachments: None

4662 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Mr Tim Griffiths [2578]

Summary:
Not enough of suitable land for large housing developments and infrastructure not designed to sustain current levels of traffic and increasing. People are travelling by car/van/lorry to employment out of the area because there are no large employers in the Vale now

Full text:
Not enough of suitable land for large housing developments and infrastructure not designed to sustain current levels of traffic and increasing. People are travelling by car/van/lorry to employment out of the area because there are no large employers in the Vale now

Change suggested by respondent:
Need to look at infrastructure to cope with present and future traffic levels.

Sound: No
Attachments: None

4668 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Mr Tim Griffiths [2578]

Summary:
Growth has got to be sensible and not prohibitive

Full text:
Growth has got to be sensible and not prohibitive

Change suggested by respondent:
The plan needs to improve infrastructure

Sound: No
Attachments: None

4669 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Mr Tim Griffiths [2578]

Summary:
The plan does not improve access to medical facilities. There has been no improvement in access to doctors/dentists since the last development plan

Full text:
The plan does not improve access to medical facilities. There has been no improvement in access to doctors/dentists since the last development plan

Change suggested by respondent:
We need more gps and dentists in the area but cannot see that happening in the near future

Sound: No
Attachments: None

4674 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Mr Tim Griffiths [2578]

Summary:
the amount of suitable land is getting smaller and smaller in Barry. You can only squeeze so much in an already tight area

Full text:
the amount of suitable land is getting smaller and smaller in Barry. You can only squeeze so much in an already tight area

Change suggested by respondent:
focus on infrastructure all around

Sound: No
Attachments: None

4685 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Mr Colin Simmonds [2797]

Summary:
The area highlighted St Athan has no space for industry growth the proposed developements will put people in to a employment void which has no employment available to them

Full text:
The area highlighted St Athan has no space for industry growth the proposed developements will put people in to a employment void which has no employ available to them

Change suggested by respondent:
-

Sound: Not specified
Attachments: None

4795 Comment

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Ms Maxine Levett [698]

Summary:
1. Future Wales – Growth Area Classification
The RLDP appears to assume that the Vale of Glamorgan is a “growth area,” but Future Wales does not classify the Vale, especially the western Vale, as part of the Cardiff, Newport and the Valleys National Growth Area.
Key points:
• Future Wales identifies specific National Growth Areas, and the Vale is not within them.
• The document additionally defines countryside communities, covering rural parts of Wales including the western Vale.
• Welsh Government stresses that LDPs must be in general conformity with Future Wales, which makes the spatial designation critical for soundness.
Could you please confirm:
• Where Future Wales designates the Vale (or the western Vale) as a growth area; and
• The evidence used by the RLDP team to justify treating the authority as such.

2. Applicability of Future Wales Policies 4 & 5 to the Western Vale
Given that the western Vale is identified as a rural area, Future Wales Policies 4 and 5 must apply:
• Policy 4: LDPs must identify rural communities, assess their needs, and set out supportive policies.
• Policy 5: LDPs must plan positively to meet the employment needs of rural areas.
Bullet point issues:
• The western Vale is clearly categorised as rural, not as a growth-focused settlement zone.
• St Athan may have distinct airport related status, but this does not reclassify the surrounding rural settlements.
• The RLDP should demonstrate how Policies 4 and 5 are shaping its spatial and economic approach.
Could you outline how the RLDP intends to incorporate Policies 4 and 5 into its strategy?

Full text:

I hope you are well. I'm writing to raise several concerns regarding the way the Replacement Local Development Plan (RLDP) currently interprets Future Wales: The National Plan 2040, particularly in relation to spatial strategy, rural policy requirements, and biodiversity designations. I would appreciate clarification on the following points.

1. Future Wales – Growth Area Classification
The RLDP appears to assume that the Vale of Glamorgan is a "growth area," but Future Wales does not classify the Vale —especially the western Vale—as part of the Cardiff, Newport and the Valleys National Growth Area.
Key points:
• Future Wales identifies specific National Growth Areas, and the Vale is not within them.
• The document additionally defines countryside communities, covering rural parts of Wales including the western Vale.
• Welsh Government stresses that LDPs must be in general conformity with Future Wales, which makes the spatial designation critical for soundness.
Could you please confirm:
• Where Future Wales designates the Vale (or the western Vale) as a growth area; and
• The evidence used by the RLDP team to justify treating the authority as such.

2. Applicability of Future Wales Policies 4 & 5 to the Western Vale
Given that the western Vale is identified as a rural area, Future Wales Policies 4 and 5 must apply:
• Policy 4: LDPs must identify rural communities, assess their needs, and set out supportive policies.
• Policy 5: LDPs must plan positively to meet the employment needs of rural areas.
Bullet point issues:
• The western Vale is clearly categorised as rural, not as a growth-focused settlement zone.
• St Athan may have distinct airport related status, but this does not reclassify the surrounding rural settlements.
• The RLDP should demonstrate how Policies 4 and 5 are shaping its spatial and economic approach.
Could you outline how the RLDP intends to incorporate Policies 4 and 5 into its strategy?

3. Biodiversity & Green Infrastructure – Key Omissions
The RLDP's Green Infrastructure (GI) Strategy appears to overlook several significant local biodiversity assets:
• Aberthaw Biodiversity Area (Council owned and agreed for retention).
An area with clear potential for designation such as Local Nature Reserve (LNR).
• Cadoxton Ponds Nature Reserve, a major ecological asset not reflected in GI mapping.
[gov.uk]
• Other sites already being considered by Scrutiny for LNR status (e.g., Barry Old Harbour, Rhoose Point), demonstrating an active Council interest in expanding nature designations.
These omissions raise questions about:
• Whether the GI Strategy has adequately captured local ecological opportunities;
• Who authored and quality assured the document, given factual omissions (e.g., mis counting bathing beaches) and lack of reference to key local sites;
• Whether biodiversity "net gain" claims are being interpreted proportionately, rather than reduced to minimal measures such as bird boxes.
Welsh Government expects the RLDP to be evidence led and based on a robust environmental baseline.
Could you confirm:
• Whether Aberthaw, Cadoxton Ponds, and related sites will be added to the GI evidence base;
• Who prepared and signed off the current GI content;
• How biodiversity requirements will be strengthened to reflect site specific ecological value.

4. Next Steps
I would welcome clarification on the above matters and would be grateful for the opportunity to discuss how the RLDP can better reflect:
• The correct Future Wales spatial classification;
• The requirements of Policies 4 and 5 for rural areas;
• Local biodiversity assets and LNR opportunities;
• A stronger evidence-based approach consistent with Welsh Government expectations.
Thank you for considering these points. I appreciate the significant work undertaken on the RLDP and hope these observations are useful in ensuring the plan is fully aligned with national policy and local opportunities.

Change suggested by respondent:

I would welcome clarification on the above matters and would be grateful for the opportunity to discuss how the RLDP can better reflect:
• The correct Future Wales spatial classification;
• The requirements of Policies 4 and 5 for rural areas;
• Local biodiversity assets and LNR opportunities;
• A stronger evidence-based approach consistent with Welsh Government expectations.

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/sfw

4857 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Emma Reed [2653]

Summary:

No evidence is provided within the Plan to better public transport and other infrastructure with the key settlement of Rhoose. Rhoose also does not have good existing public transport infrastructure compared to other settlements with only 1 train per hour and 1 bus service which is long and tedious. Rhoose has few shops and most shops are accessed in Barry. Most doctors are in Barry or Llantwit Major. Rhoose has no comprehensive school. Rhoose is a town with the facilities of a village and should be treated as such.

Full text:

No evidence is provided within the Plan to better public transport and other infrastructure with the key settlement of Rhoose. Rhoose also does not have good existing public transport infrastructure compared to other settlements with only 1 train per hour and 1 bus service which is long and tedious. Rhoose has few shops and most shops are accessed in Barry. Most doctors are in Barry or Llantwit Major. Rhoose has no comprehensive school. Rhoose is a town with the facilities of a village and should be treated as such.

Change suggested by respondent:

Rhoose to have better transport and infrastructure both public and road before any further development is considered. Rhoose needs local accessible facilities such as comprehensive schools, doctors etc before any further development. The plan should provide these to ensure it is sound. The evidence does not point to Rhoose being sustainable.

Sound: No

Attachments: None

5043 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mrs Wendy Hussey [3085]

Summary:

Please stop building on green field sites. There are a lot of brown field sites in the vale that can be used. They are more expensive to clear but that shouldn't matter. The health of the vale should be of primary concern. Soon we won't have any nature left.

Full text:

Please stop building on green field sites. There are a lot of brown field sites in the vale that can be used. They are more expensive to clear but that shouldn't matter. The health of the vale should be of primary concern. Soon we won't have any nature left.

Change suggested by respondent:

Brown field sites should be the first sites used. Look after the are we live in. Please don't destroy it.

Sound: No

Attachments: None

5050 Comment

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mrs Wendy Hussey [3085]

Summary:

What is the problem with the building of council houses. Reading the plan everything sounds wonderful. Will reality live up to its aims.

Full text:

What is the problem with the building of council houses.

Change suggested by respondent:

Reading the plan everything sounds wonderful. Will reality live up to its aims.

Sound: No

Attachments: None

5060 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Mr Jon Davies [3109]

Summary:
I object

Full text:
I object

Change suggested by respondent:
Total re think

Sound: No
Attachments: None

5069 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Mrs Anne Sloman [668]

Summary:
This is an objection to further development in Rhoose on the following grounds:
● over development without improvement to infrastructure
● current roads unable to support additional traffic as a result of further development
● loss of green fields to building, solar panels, battery storage units
● additional pressure on already overloaded pumping stations/sewerage infrastructure
● adverse effect on current residents mental health due to over population of the village and loss of green areas
● increase in youth annoyance/antisocial behaviour

Full text:
This is an objection to further development in Rhoose on the following grounds:
● over development without improvement to infrastructure
● current roads unable to support additional traffic as a result of further development, roads in/out of Rhoose are already choked
● loss of green fields/arable land to building, solar panels, battery storage units
● Model Farm proposed development will change the landscape, destroy habitats, reduce biodiversity, add pressure to roads, cause flooding in Porthkrry Park
● additional pressure on already overloaded pumping stations/sewerage infrastructure
● adverse effect on current residents mental health due to over population of the village and loss of green areas
● increase in youth annoyance/antisocial behaviour

Change suggested by respondent:
-

Sound: Not specified
Attachments:
Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/sz9

5114 Support

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]

Summary:

Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth

The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.

With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward.

The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.
Without prejudice to the Minster's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.
National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.
After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:
Annex 1 – General Conformity with Future Wales
• No significant concerns
Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)
• Spatial Strategy and Primary Settlements
• Housing and Economic Growth Levels – Regional Collaboration
• Maximising Affordable Housing Provision
• Delivery & Implementation – General
• Gypsy and Travellers
• Renewable Energy
• Minerals
• Best and Most Versatile Agricultural Land (BMV)
• Welsh Language

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.
My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.
Yours sincerely,

Neil Hemington
Chief Planner Welsh Government

Annex 1 - Statement of General Conformity
The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).
There is a joint position statement on the relationship between Bridgend, Cardiff and the Vale of Glamorgan (BP20A), which considers population growth, migration patterns, housing completions, employment characteristics, demographics, commuting and transport links between the three adjoining authorities. The Welsh Government supports the principle of this work which demonstrates how change in the Vale of Glamorgan relates and complements growth in adjoining local authorities. This approach illustrates a good mechanism for other local authorities to follow.
Reasons
Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the climate change and biodiversity emergencies, making the best use of resources.
Policy 1 and Policy 33 of Future Wales states that Cardiff, Newport, and the Valleys will be the main focus for growth and investment in the region. The strategic diagram (p163) also identifies the Vale of Glamorgan within the National Growth Area. The Vale of Glamorgan RLDP, specifically BP20A, provides robust evidence on the interrelationship and key issues with adjoining authorities, including their interaction and how they have shaped and influenced the scale/location of growth in the RLDP. This is set out in the three Joint Position Statements (JPSs).
BP45 'Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR), May 2024, provides further evidence on how the scale of growth indicated for the region has shaped the scale of future economic growth within the Vale of Glamorgan. This results in a higher level of employment growth in the Vale of Glamorgan primarily to increase self-containment and reduce out-flows to adjoining urban areas. Two key areas for future economic growth are identified at Cardiff Airport/Bro Tathan Enterprise Zone and Aberthaw Power Station.
The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.
On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):
Policy 1: Where will Wales grow
Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 6: Town Centre First
Policy 10: International Connectivity – Cardiff Airport
Policy 12 Regional Connectivity
Policy 33: National Growth Area – Cardiff, Newport and the Valleys
Policy 36: South-East Metro
Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.
With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to

settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.

The Level of Growth - Homes and Jobs

The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).

Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.

BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.

Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.

The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level of growth proposed in the plan.

We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.

The Welsh Government notes that BP0A identifies small and large windfalls, based on historic trends of 53/yr and 80/yr respectively. Also, the large windfalls are not included in the first two years of the trajectory, as per the DPM. A non-delivery allowance of 5% is identified, which reflects local characteristics in the Vale of Glamorgan. A flexibility allowance of 9.8% has been factored into the provision. The Welsh Government supports this approach, although whilst Appendix 1 contains a housing trajectory, there is no table to mirror that of Table 21, DPM. This should be included in Appendix 1. 6

Jobs: The Council's 10-year dwelling-led growth option results in a requirement for 4,875 new jobs (325 p/a) over the plan period. This broadly aligns with the projected growth for 5,338 (355 p/a) new jobs in the Employment Land Review (BP12) and as set out in Policy SP14.

The level of employment growth proposed (5,338 jobs) over the plan period is below the target in the currently adopted plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.

In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of homes and jobs proposed in the plan, which is in general conformity with Future Wales.

Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.
The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.
Paragraph 6.137 of the plan states:
"Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary."
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?
Affordable Housing Exceptions Sites
Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.
Employment Land
The Council's Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).
Delivery and Implementation
PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.
The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.
The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have 'rolled over' from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.
The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters.
It will be for the Council to justify deliverability supported by robust financial viability.
Gypsy and Travellers
The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are 'immediate' by 2026. WG note that 4 pitches have

since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

Policy SP9 identifies a site at Llangan (0.76Ha) to accommodate the 7 pitches needed. It will be for the Council to demonstrate the appropriate site selection assessment process has been followed and that the site complies with requirements in PPW (4.2.35), Circular 005/2018 (paragraph 35) any relevant guidance and the DPM (5.80-5.85) to allocate a deliverable site in the plan period. The views of the relevant statutory bodies must also be agreed with no outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.

Renewable Energy

Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Could the Council provide an update on alternative options for a DHN in Barry?

It is welcome that the Renewable Energy Assessment (REA) has considered BMV policy, specifically for solar PV, and use of the Predictive ALC Map. The assessment has only considered non-BMV land (Subgrade 3b, Grade 4 and 5). The assessment would benefit from referencing the clarification provided in the DCPO letter of 1st March 2022 in respect of solar PV and BMV agricultural land for completeness.

The study identifies that in the Vale of Glamorgan solar development is more suitable than wind energy because of the flight path of aircraft in the south of the County Borough. However, there are some opportunities for wind sites, but these are likely to be small (<10MW) where aviation risks are lower and there is some grid access. Conversely, there are large expanses of land suitable for solar areas (>10MW) to the West of the County Borough, where there is little existing development. The study identifies 20 large-scale solar areas but recognises that grid constraints may impact the ability of sites to come forward.

Solar and wind search areas (where appropriate) below the 10MW Developments of National Significance (DNS) have been identified (Policy CC3). The plan also includes a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW (Policy CC4). Policy CC3 makes reference to adhering to the criteria in Policy CC4. However, would it not be the case that if search areas have been identified in Policy CC3 have they not already met the criteria? If they would not, should they be identified in the first place? Clarity would be beneficial. The Welsh Government supports the approach but seeks clarity on the point raised.

The Welsh Government notes the proposed search areas for wind energy near Morfa Ystrad Owen/Nant Rhydhalog, according to the Peatlands of Wales Evidence Score Map, the search area includes areas of peatland (Evidence Score 4). The site is also a SINC. This raises concerns as to how the inclusion of this search areas meets the policy test in PPW 6.4.15, 1a and 1b (Stepwise) regarding avoidance of irreplaceable peatland habitats and PPW 6.4.34.

Policy CC4 refers to Developments of National Significance (DNS) in 6.344 and 6.346. This should now refer to Strategic Infrastructure Projects (SIP) which replaced DNS.

Minerals

The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in the Vale of Glamorgan. The Welsh Government policy clarification letter (dated 11 November 2021) identifies a surplus of 1.68mt of crushed rock. As there is a surplus of crushed rock reserves and a lack of sand and gravel production in the Vale, no specific allocations are required in the replacement plan. It is unclear whether a Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region been agreed, or does the latest Position Statement (July 2022) explain how any shortfall will be met across 9

the region, particularly for crushed rock, of which the Vale has a surplus? Clarification would be beneficial.

BMV Agricultural Land

The Welsh Government has engaged with the Council for land quality advice, survey advice and ALC survey validation for candidate sites. The LPA has produced a specific topic paper on BMV policy application. BP23A. The Deposit RLDP allocates 188 hectares of housing land, 5.62 ha is identified as BMV land (under 3% of total housing allocations). The RLDP:

• Has sought to avoid BMV land wherever possible;
• Uses the Predictive ALC Map as a core evidence layer to inform: The spatial strategy;
• Settlement hierarchy decisions; and
• Candidate site assessments.
•
• Directs strategic growth to areas with least BMV land
• Removes or avoids allocations where BMV impacts were significant or unjustified.
• Quantifies total BMV loss and demonstrates it is minimal (5.62ha) and proportionate at plan level.
• Applies a sequential approach through: Preference for brownfield and non-BMV sites;
• Replacement of higher-BMV sites with lower-grade alternatives where possible.
•
• Requires site-specific ALC surveys to verify actual land quality before allocation.
• Demonstrates that allocated BMV land is: Often small, fragmented, or constrained;
• Sometimes previously disturbed or incapable of being farmed differently from surrounding lower-grade land; and
• Necessary to deliver the Plan's housing strategy where reasonable alternatives are unavailable.
•

In conclusion, the Welsh Government consider the Authority has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy, and on that basis no objection is offered.

Green Infrastructure
Policy SP19 should explicitly reference the need for development to be accompanied by a Green Infrastructure Statement.
PPW12 requires decision makers to apply the step wise approach to GI, with enhancement secured at every stage where possible, there is no distinction made between the quality of the GI assets – the qualification in the policy statement that states proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure should be redrafted to remove the quality reference. The need to avoid an impact in the first instance should also be explicitly incorporated into the policy.
Criterion 1 (Policy SP20) should be redrafted – the stepwise approach in PPW 12 6.4.15 1a - does not distinguish between relative ecological value – the avoidance step applies to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.
Welsh Language
There is limited reference to the Welsh language in the plan, either potential adverse impacts arising through development, or mechanisms via a policy framework to support and grow the use of the language. There are references to a number of Welsh-medium schools (3.26) and the increase in the number of people able to speak Welsh according to the 2011 census (3.52) but there is no mention of the authority's Welsh Language Strategy or promoting or cross-referencing to the aims of 10

Cymraeg 2050: A million Welsh-speakers. Paragraph 6.81 of the plan refers to development north west of Barry:
"Land at North West Barry is allocated for a residential development of up to 376 dwellings and public open space. The site is in a sustainable location on the edge of the Barry, a key settlement, in a location that is well served by services and facilities, including a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium and Church in Wales) and two high schools (English and Welsh Medium) all located in reasonable walking distance. There is an active travel route along Port Road West, bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry. Barry station is 1.3 miles from the site entrance."
There is no mention that the Council want to undertake a Welsh Language Impact Assessment (WLIA) so there appears no attempt to measure the impact on the Welsh schools resulting from housing development? Could the Council clarify if such implications have already been covered in the WLIA for the plan, ISA, or are any specific policies necessary?

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/syf

5297 Comment

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mr Ken Timmins [1489]

Summary:

There needs to be a Plan for Wales that includes Housing, Jobs, better Public Transport. The plan should also take into account the wellbeing of the people who live there. This should include much more local, detailed examination of communities, their feelings, the mix of land use. The plan below is mainly about building housing. Destroying farm land goes against the feeling of what Wales is. I just feel that this is a plan to satisfy the needs of the UK Government and to make developers richer by building over our legacy to future generations.

Full text:

There needs to be a Plan for Wales that includes Housing , Jobs, better Public Transport. The plan should also take into account the wellbeing of the people who live there. This should include much more local, detailed examination of communities ,their feelings, the mix of land use. The plan below is mainly about building housing. Destroying farm land goes against the feeling of what Wales is. I just feel that this is a plan to satisfy the needs of the UK Government and to make developers richer by building over our legacy to future generations.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5315 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mrs Carol Watts [3231]

Summary:

There is no infrastructure to go with all this housing ie: No Dental provisions
No Doctor availability
No school facilities
Everything is overwhelmed!

Full text:

There is no infrastructure to go with all this housing ie: No Dental provisions
No Doctor availability
No school facilities
Everything is overwhelmed!

Change suggested by respondent:

Set up more infrastructure first, then look it again

Sound: No

Attachments: None

5427 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mrs Susan Evans [712]

Summary:

This indicates that Rhoose, St Athan and Llantwit Major are suitable for additional housing as they are served by existing public transport, however this does not take into account that train services are 1 per hour and have regularly had the promise of increase deferred and those trains at peak times are already overloaded. St Athan does not have a train station. Buses are also 1 per hour in Rhoose, so this can not be considered well served.
Road access is also very overloaded along Port Road, and proposals to mitigate this are based on outdated traffic counts.

Full text:

This indicates that Rhoose, St Athan and Llantwit Major are suitable for additional housing as they are served by existing public transport, however this does not take into account that train services are 1 per hour and have regularly had the promise of increase deferred and those trains at peak times are already overloaded. St Athan does not have a train station. Buses are also 1 per hour in Rhoose, so this can not be considered well served.
Road access is also very overloaded along Port Road, and proposals to mitigate this are based on outdated traffic counts.

Change suggested by respondent:

Remove Rhoose, St Athan and Llantwit Major from the list for housing development.

Sound: No

Attachments: None

5482 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mr David Entwistle [3264]

Summary:

The plan in its current form is far from sustainable. The amount of housing proposed will overwhelm the current infrastructure which already cannot cope with the current population. The locations are poorly thought out and do not have adequate access to public transport. The plan does not propose adequate solutions to address the lack of public transport and other infrastructure. Simply saying additional infrastructure to support the sale of growth will be identified is not acceptable. The strategy lacks clarity, depth and is based upon inadequate outdated information.

Full text:

The plan in its current form is far from sustainable. The amount of housing proposed will overwhelm the current infrastructure which already cannot cope with the current population. The locations are poorly thought out and do not have adequate access to public transport. The plan does not propose adequate solutions to address the lack of public transport and other infrastructure. Simply saying additional infrastructure to support the sale of growth will be identified is not acceptable. The strategy lacks clarity, depth and is based upon inadequate outdated information.

Change suggested by respondent:

The plan needs to lay out more clearly how infrastructure and public transport links will be improved prior to the proposal of new housing developments. Having read through the data much of the information given is based upon, it seems to be out of date and limited in scope. New data needs to be collected and in much greater depth, especially around issues such as traffic volumes. This would allow better decisions to be made and hopefully highlight issues that residents say is currently a problem but the council seem to be unaware of or ignoring.

Sound: No

Attachments: None

5507 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mrs Barbara Entwistle [2589]

Summary:

Barry is seen as an easy town to cram houses in incorrect sites such as the site at North West Barry.
This site does not have good transport links for commuters, the train station is not an easy walk & will add considerably to the time spent commuting especially if children have to be dropped to school on route. This site will encourage use of cars & increased traffic from proposed sites in Rhoose & the Vale will make life very difficult for commuters & all road users.
Garage is nearest shop which is a dangerous walk across busy forecourt.

Full text:

Barry is seen as an easy town to cram houses in incorrect sites such as the site at North West Barry.
This site does not have good transport links for commuters, the train station is not an easy walk & will add considerably to the time spent commuting especially if children have to be dropped to school on route. This site will encourage use of cars & increased traffic from proposed sites in Rhoose & the Vale will make life very difficult for commuters & all road users.
Garage is nearest shop which is a dangerous walk across busy forecourt.

Change suggested by respondent:

Additional infrastructure statement is totally unacceptable.
Infrastructure improvements should be identified & implemented before & not after any developments go ahead.

Sound: No

Attachments: None

5510 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mrs Barbara Entwistle [2589]

Summary:

Housing is focusing on Barry & the residents of Barry are experiencing problems with lack of healthcare & other services.
Traffic around the town is getting out of hand even during the day.
Commuting to work is taking longer & public transport & parking at the station at Barry is inadequate.
Barry & it's services are at breaking point.
The town needs improving - roads, pavements etc & green space retained such as the land at Weycock Cross to encourage well being for it's residents & wildlife.

Full text:

Housing is focusing on Barry & the residents of Barry are experiencing problems with lack of healthcare & other services.
Traffic around the town is getting out of hand even during the day.
Commuting to work is taking longer & public transport & parking at the station at Barry is inadequate.
Barry & it's services are at breaking point.
The town needs improving - roads, pavements etc & green space retained such as the land at Weycock Cross to encourage well being for it's residents & wildlife.

Change suggested by respondent:

Take the focus off Barry for housing.
Provide smaller settlements at places like Culverhouse Cross & provide a little more infrastructure in these areas.
Increase housing in all other areas of the Vale to ensure the burden of extra housing & it's needs are shared & not shouldered by Barry all the time!

Sound: No

Attachments: None

5658 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Miss Julia Thompson [2631]

Summary:

The plan does not give detailed plans on how it will prevent flood risk in several areas across the plan, mitigate traffic congestion and has significantly underestimated the additional pressures on roads and services.

Across the patch the number of houses proposed exceed the

Full text:

The plan does not give detailed plans on how it will prevent flood risk in several areas across the plan, mitigate traffic congestion and has significantly underestimated the additional pressures on roads and services.

Across the patch the number of houses proposed exceed the

Change suggested by respondent:

For VOG to take clear responsibility for where they plan to allocate housing:
Not on Green Wedge land.
Be honest about local amenities.
Be honest about travel times.
Consider the local environment and wildlife that frequent the area.
Take heed of the flood risk areas.

Sound: No

Attachments: None

5660 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Councillor Samantha Campbell [1002]

Summary:

The deposit plan is based around public transport being sufficient in areas that it is not. Rhoose, St Athan, and Llantwit Major are not accessible frequently without vehicular transportation, thus making the base plan for this moot, as it specifies public transport. Infrastructure within these areas is not sufficient for current residents let alone future development.

Full text:

The deposit plan is based around public transport being sufficient in areas that it is not. Rhoose, St Athan, and Llantwit Major are not accessible frequently without vehicular transportation, thus making the base plan for this moot, as it specifies public transport. Infrastructure within these areas is not sufficient for current residents let alone future development.

Change suggested by respondent:

Rhoose, St Athan, Llantwit Major need to be removed from the plan until sufficient public transport and infrastructure is in place for further development. Developers are being coined as the placemakers of these plans which is incorrect as S106 monies is not sustainable for development given inflation costs, deliverability of projects and also uptake of schemes.

Sound: No

Attachments: None

5670 Comment

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Councillor Samantha Campbell [1002]

Summary:

Rhoose, St Athan and Llantwit Major do not have sustainable bus or train networks, with in frequent bus services and trains once an hour, if at all. This will increase vehicular traffic.

Full text:

Rhoose, St Athan and Llantwit Major do not have sustainable bus or train networks, with in frequent bus services and trains once an hour, if at all. This will increase vehicular traffic.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5770 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mr William Hart [1009]

Summary:

Barry is already oversized and infrastructure, particularly roads and sewage disposal, do not work properly. Green wedges were introduced to prevent urban sprawl (a council policy) and they should be honoured or Barry will continue to grow. Changing Green Wedges to suit developers is unacceptable.
Adding and improving road junctions will not overcome the increased demand on our roads.
The water authority cannot be trusted to dispose of increased sewage/rainwater. They don't even cope with existing load (witnessed by the 'safer-seas' app.) Tourists need to be attracted, not repelled by sewage floating in the sea.

Full text:

Barry is already oversized and infrastructure, particularly roads and sewage disposal, do not work properly. Green wedges were introduced to prevent urban sprawl (a council policy) and they should be honoured or Barry will continue to grow. Changing Green Wedges to suit developers is unacceptable.
Adding and improving road junctions will not overcome the increased demand on our roads.
The water authority cannot be trusted to dispose of increased sewage/rainwater. They don't even cope with existing load (witnessed by the 'safer-seas' app.) Tourists need to be attracted, not repelled by sewage floating in the sea.

Change suggested by respondent:

The plan needs to show that Barry has reached its maximum size and is a clean and healthy place to live in. We now need new settlements away from existing towns and villages. Margins either side of main roads can accomodate many houses and further use of such land should be made to spread housing around the area. We do not want to all be crammed into one massive town.

Sound: No

Attachments: None

5813 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mr William Hart [1009]

Summary:

Barry is too large already and overpopulated.
Roads do not cope. Welsh Water do not cope with sewage.

Full text:

Barry is too large already and overpopulated.
Roads do not cope. Welsh Water do not cope with sewage.

Change suggested by respondent:

Road capacity needs to be increased to cope properly with current demand before considering expansion.
The irresponsibility and poor performance of Welsh Water also need to be taken into account before considering expansion.

Sound: No

Attachments: None

5847 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mr Jeff Smith [3399]

Summary:

Lack of road and basic infrastructure (sewage capacity, electricity + gas grids) - Dr, dentists etc..

Full text:

Lack of road and basic infrastructure (sewage capacity, electricity + gas grids) - Dr, dentists etc..

Change suggested by respondent:

Much more consideration needs to be taken into account of know bottle necks e.g the plan states "proposed railway stations" - it should be "Actual railway stations" -- until its built its not available for use -- same applies for estate parks / facilities that don't have the funds ring fenced before construction of estates begins and then doesn't get completed e.g. Barry waterfront.

Sound: No

Attachments: None

5848 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mr Jeff Smith [3399]

Summary:

Your assuming employment opportunities will be in the local area - we have increased unemployment --

Full text:

Your assuming employment opportunities will be in the local area - we have increased unemployment --

Change suggested by respondent:

-

Sound: No

Attachments: None

5890 Comment

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: HBF (Mr Mark Harris) [538]

Summary:

The plan lacks aspiration and does not provide a level of growth in line with the Vale's role as part of the national growth area identified in Future Wales.

The plan's role is to balance the 'need' for housing in a sustainable way, rather than limit delivery.

The plan's housing requirement is being limited by a level of delivery lower than the plan has previously achieved.

Delivering more housing will support economic growth and deliver more affordable homes.

The latest Welsh Government housing needs data requires an increase in the level of housing proposed.

Full text:

The current plan was adopted before Future Wales identified the Vale of Glamorgan as a national growth area; therefore, planning to continue delivering at the same average rate as before this change in status clearly lacks ambition.

Para 5.8, there is no mention that the ten-year period used includes the pandemic and a significant increase in building costs, both of which slowed housebuilding rates and brought down the average annual delivery rate.

HBF suggests a higher rate of annual delivery could be achievable, as demonstrated by previous annual completions of 917 at its highest point and with six of the ten years higher than 526. This is supported by the Council's document BP7 Housing and Employment growth options, which identifies the 5yr build rate average (2016-2021) as 780 units, again well above that currently suggested by this plan.

In order to meet the high demand for affordable homes, a larger housing target would deliver more affordable homes, as each site would be subject to a percentage contribution of affordable homes.

Although it is right for the plan to be as sustainable as possible, a balance also has to be achieved, due to the position of the Vale of Glamorgan so close to Cardiff and Bridgend, there are always going to be job opportunities outside of the authority. Both Cardiff and Bridgend have very good linkages by rail, so such commuting can easily be achieved sustainably. In fact, the plan has said that its strategy is to place new development close to these public transport facilities. HBF consider that the level of employment planned within the Vale of Glamorgan should not be a limit on the level of housing proposed. This is an example of where cross-boundary issues need to be given more consideration, particularly due to the Vale's role as part of the wider national growth area.

The latest housing needs data released by the Welsh Government shows a significant increase in the need for affordable housing to meet unmet need and an increase in annual arising need. These figures both exceed those currently in Future Wales. This new data means the plan should increase its housing requirement to take account of this increased housing need. HBF suggests this adds to the previous reasons why the housing requirement figure should be increased.

In terms of detailed wording, HBF questions whether a plan can deliver. It can allocate land to allow for delivery, but the plan can't actually deliver.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5891 Comment

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: HBF (Mr Mark Harris) [538]

Summary:

In line with the comments already made on point 1 of the sustainable growth strategy, the HBF considers that the level of housing proposed lacks ambition and is not in line with the Vale of Glamorgan's position as a regional growth area in Future Wales.

The words 'including a minimum of 3,070 affordable homes' should be changed to ' a target of 3,070 affordable homes'. The reason for this is that a minimum suggests that it should be more; however, other relevant housing policies are worded to provide for a defined number or target. This change in wording does not stop more from being delivered.

The approach to limiting housing development, other than affordable-led schemes with a minimum of 50% affordable, in the identified towns and villages, restricts the ability of SME developers and, therefore, the range of homes that might be provided by the plan.

The HBF questions the wording under the heading 'Infrastructure', which is not appropriate wording, as it is part of the plan's role to identify the necessary infrastructure to deliver the level of growth proposed. The provision of infrastructure, which is necessary for development, is covered by other policies in the plan.

Why is the housing flexibility allowance figure not included in this policy?

Full text:

In line with the comments already made on point 1 of the sustainable growth strategy, the HBF considers that the level of housing proposed lacks ambition and is not in line with the Vale of Glamorgan's position as a regional growth area in Future Wales.

The words 'including a minimum of 3,070 affordable homes' should be changed to ' a target of 3,070 affordable homes'. The reason for this is that a minimum suggests that it should be more; however, other relevant housing policies are worded to provide for a defined number or target. This change in wording does not stop more from being delivered.

The approach to limiting housing development, other than affordable-led schemes with a minimum of 50% affordable, in the identified towns and villages, restricts the ability of SME developers and, therefore, the range of homes that might be provided by the plan.

The HBF questions the wording under the heading 'Infrastructure', which is not appropriate wording, as it is part of the plan's role to identify the necessary infrastructure to deliver the level of growth proposed. The provision of infrastructure, which is necessary for development, is covered by other policies in the plan.

Why is the housing flexibility allowance figure not included in this policy?

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5990 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Barratt Redrow Homes [2669]

Agent: Lichfields

Summary:

Policy SP1 proposes delivering 7,890 dwellings by 2036, including 3,070 affordable homes, with new sites outside Strategic Growth Areas limited to small-scale affordable housing schemes. However, Welsh Government 2022-based projections estimate households in the Vale of Glamorgan will increase from 57,676 in 2021 to 67,299 by 2036, a rise of 9,623 households. With a 4% household-to-dwelling conversion uplift, the required dwellings would be 10,008, significantly above the plan target. The policy also proposes 205 affordable homes per year, far below the LHMA 2023 identified need of about 1,075–1,114 annually, meaning affordable housing delivery would meet only 18.4% of identified demand.

Full text:

Policy SP1 sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.

The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SP1. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SP1. The number of overall dwellings identified in Policy SP1 will therefore not meet the identified household growth needs of VoG for the RLDP period. The Council should review the position in terms of the updated household projections.

It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SP1 seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SP1 therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.

Change suggested by respondent:

In order for Policy SP1 to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:

"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"

Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites in appropriate Primary and Minor Rural Settlements. In order to meet the true identified housing needs of VoG during the RLDP period, Primary and Minor Rural Settlements will likely need to accommodate further new dwellings than the RLDP currently allocates (please refer to our comments below on Policy SP2 and Policy HG4 for further commentary).

Sound: No

Attachments: None

6025 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mr Paul Miller [2350]

Summary:

The proposed plan will place further strain on already barely adequate public services; the roads are already heavily congested particularly during peak travel times; there will be a detrimental loss of green spaces within the area which may reduce the area's capacity to create a feeling of well being.
The roads are already in a poor state with much restorative work urgently required so any increase in the number of cars will only exacerbate this situation.

Full text:

The proposed plan will place further strain on already barely adequate public services; the roads are already heavily congested particularly during peak travel times; there will be a detrimental loss of green spaces within the area which may reduce the area's capacity to create a feeling of well being.
The roads are already in a poor state with much restorative work urgently required so any increase in the number of cars will only exacerbate this situation.

Change suggested by respondent:

Before further plans for building new housing areas are considered, there should be an increase in the provision of basic facilities such as GP Surgery, Dental Surgery, improved public transport links, creation of more spaces within schools at all levels from Reception to Year 12.

Sound: No

Attachments: None

6170 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mrs Victoria Tipples [2547]

Summary:

Why is all the housing being considered all along one main road from Rhoose to Weycock Cross? The area can’t handle the current level of traffic. One small car breaking down along that road chokes up the whole of Barry. Then you want to add 1000+ houses along the same route. How can this not be seen as a poor decision? We all understand that there needs to be new housing, but surely more thought could go into choosing a more suitable area to build.

Full text:

Why is all the housing being considered all along one main road from Rhoose to Weycock Cross? The area can’t handle the current level of traffic. One small car breaking down along that road chokes up the whole of Barry. Then you want to add 1000+ houses along the same route. How can this not be seen as a poor decision? We all understand that there needs to be new housing, but surely more thought could go into choosing a more suitable area to build.

Change suggested by respondent:

Don’t build at Weycock Cross, and reconsider the housing in Rhoose due to the volume of traffic along one main road.

Sound: No

Attachments: None

6290 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mr Steve Ashman [3161]

Summary:

There is a problem with traffic across Barry and Rhoose. The college plus more houses being built at Rhoose point, the ongoing battle at Model farm as well as more houses being built at Weycock cross will add to traffic congestion. There also is only one train and bus an hour so if you're trying to get cars off the roads these need to be increased.

Full text:

I went to the consultation meeting in Rhoose yesterday. My questions are why is an access road being built to the bypass instead of sending the traffic through the village. Also no amenities are being provided as what happened with Rhoose point. There is also the problem with the college traffic plus more houses being built at Rhoose point and also the ongoing battle at Model farm. More houses are being built at Weycock cross adding to traffic congestion. The proposed changes to Weycock cross roundabout will not work because if you put traffic lights on port road to allow traffic out of the proposed development by the toby inn the amount of traffic coming from Rhoose would be a nightmare. If you lived around here you would know that you only have to have roadworks on port road coming from the airport and it's gridlocked for hours. There also is only one train and bus an hour so if you're trying to get cars off the roads these need to be increased.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/twh

6535 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: MS Andrew R T Davies [1324]

Summary:

The entire strategy behind the deposit plan is flawed and the process needs to begin again.

Full text:

I am writing to object to the Vale of Glamorgan Council's Replacement Local Development Plan.

I strongly feel that all the key sites stipulated are unsuitable and inappropriate. The entire strategy behind the deposit plan is flawed and the process needs to begin again.

I also express deep concern that the public have been unable to easily access material owing to the ways it has been published. The average person has not been able to adequately consider all of the information within the consultation period. As such the public need more time to produce their consultation responses and at the very least, the consultation period must be extended.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3yf

6699 Support

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Persimmon Homes (East Wales) [1068]

Agent: Asbri Planning

Summary:

Sustainable Growth Strategy (Policy SP1)

The Deposit Plan's overarching strategy in relation to sustainable growth is supported. The primary focus of concentrating housing growth within the 'Strategic Growth Area' (i.e. where the main centres of population are accommodated, and which are served by a range of facilities and services, and are accessible by a range of transport modes) as outlined by Policy SP1 is considered appropriate and will allow for the delivery of sustainable and resilient communities.

As per previous representations submitted by Asbri Planning on behalf of Persimmon Homes in relation to the RLDP Preferred Strategy, the prior identification of the strategic-scale (1,500 unit) Key Site at North East Barry was considered to represent an over-reliance on one site to meet the housing demand of the Authority's Key Settlement (with associated constraints in relation to the delivery of units on a strategic-scale site within the early mid part of the plan period).

It is considered that the inclusion of North West Barry as a Key Site, supplemented by a number of smaller housing allocations as identified in Policy HG1, will ensure that the housing requirement for the Barry can be met in a robust and deliverable manner.

Full text:

We write specifically with regard to the Key Site at 'North West Barry' (Policy SP4: KS1). As the Authority are aware, a significant amount of supporting information has been prepared in relation to the Key Site over the course of the preparation of the Replacement LDP to date – this detailed evidence has clearly demonstrated that the inclusion of 'North West Barry' as a Key Site with the Replacement Plan fully accords with the Replacement LDP strategy. Furthermore, the detailed submissions have evidenced that the site is entirely deliverable and viable.

In summary, this representation sets out support for the inclusion of Land at North West Barry as a Key Site within the Replacement LDP. Our Client (Persimmon Homes) is fully committed to the delivery of the allocation, in accordance with the policies of the Replacement Plan (both site-specific and plan-wide policies inclusive).

We would highlight that although the representation provides overarching support for the Deposit Plan (and the inclusion of North West Barry as a Key Site), a number of detailed objections are submitted in relation to specific elements of the proposed wording of the Key Site policy (HG1: KS1). In addition, the wider policies of the Deposit Plan have been reviewed in detail and comments are submitted accordingly.

Background

By way of background context, as the Authority are aware, a Candidate Site representation was submitted on behalf of Persimmon Homes in relation to Land at Weycock Cross, Barry, at the Stage 1 Call for Sites in September 2022 (Site Ref. 449). The land (circa 7 hectares) was put forward for inclusion in the Replacement LDP for a housing allocation (for circa 180 units). Within the Replacement LDP Preferred Strategy (published November 2023), the Candidate Site at Weycock Cross was not identified as a Key Site, in light of the preferred allocation of 1,500 units at land at North East Barry. Further to issues arising in relation to the deliverability of the North East Barry Key Site, the Authority subsequently consulted on alternative options for the provision of sufficient housing land within Barry, with the Candidate Site at Weycock Cross ('North West Barry') identified as capable of delivering 376 units (as taken forward within the Deposit Plan). A significant degree of supporting survey and assessment work has been prepared in relation to the North West Barry Key Site which serves to demonstrate that the site (at a capacity of 376 units) presents a sustainable, deliverable and viable allocation, capable of accordance with national sustainable placemaking outcomes.

Sustainable Growth Strategy (Policy SP1)

The Deposit Plan's overarching strategy in relation to sustainable growth is supported. The primary focus of concentrating housing growth within the 'Strategic Growth Area' (i.e. where the main centres of population are accommodated, and which are served by a range of facilities and services, and are accessible by a range of transport modes) as outlined by Policy SP1 is considered appropriate and will allow for the delivery of sustainable and resilient communities. As per previous representations submitted by Asbri Planning on behalf of Persimmon Homes in relation to the RLDP Preferred Strategy, the prior identification of the strategic-scale (1,500 unit) Key Site at North East Barry was considered to represent an over-reliance on one site to meet the housing demand of the Authority's Key Settlement (with associated constraints in relation to the delivery of units on a strategic-scale site within the earlymid part of the plan period). It is considered that the inclusion of North West Barry as a Key Site, supplemented by a number of smaller housing allocations as identified in Policy HG1, will ensure that the housing requirement for the Barry can be met in a robust and deliverable manner.

Overall Growth Levels (Policy SP6)

It is acknowledged that the preferred growth option (dwelling-led 10 Year scenario), upon which the RLDP housing requirement figure is based, reflects what has been delivered in the Authority in recent years, and is considered by the Authority to be realistic and suitably ambitious given the Vale's position within the National Growth Area. However, as a general comment, it is considered that targeting a higher/more ambitious growth rate would be appropriate. In reviewing the most recent LDP Annual Monitoring Report (Vale of Glamorgan LDP 2011-2026, 7th Annual Monitoring Report, 1st April 2024 31st March 2025) (published October 2025), it is clear that there is a shortfall in housing delivery in the Vale of

Glamorgan. It is stated that: "Between 1st April 2011 and 1st April 2025, a total of 6,999 dwellings were completed within the Vale of Glamorgan of which 4,641 units were general market dwellings against the 2025 AMR target of 6,387 that should have been developed at this point in the plan period, in accordance with the target. The number of additional general market dwellings delivered is 27.3% below the monitoring target".

In light of the fact that there is a significant shortfall in housing delivery (i.e. currently 27.3% lower than the LDP target), it is considered that a higher growth level for the
Replacement Plan period would assist in rectifying under-delivery, allowing for housing completions to be better aligned with evidence of need (rather than repeating past shortfalls).

On February 12th 2026, the Welsh Government published updated estimates of additional housing need in Wales. The figures replace the 2019-based estimates and draw on the latest available data, including the 2022-based household projections published in late 2025. In summary, Welsh Government identify that there is a current estimated existing unmet need of 9,400 housing units. Estimates of existing unmet need have increased by 64% since the 2019-based estimates, due to a rise in homeless households in temporary accommodation.

In terms of future housing need, on average, between 7,800 and 9,300 additional housing units are estimated to be needed annually over the five-year period from July 2025 to June 2030, with a central estimate of 8,700 from newly arising need. The estimated newly arising need for July 2025 to June 2030 is higher than in the 2019-based estimates. This increase reflects higher projected household growth in the 2022-based household projections compared with the 2018-based projections used previously. The Authority will need to give detailed consideration to the implications of the updated estimates of housing need. As the most up to date projections, the Replacement LDP must properly account for the
new dataset to ensure soundness of the plan. In this regard, it is stated at Paragraph 5.34 of the Development Plans Manual that "In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base."

Accordingly, Paragraph 5.35 goes on to state that "All LPAs should use these projections and the resultant household numbers when considering the level of housing provision for a plan period".

In light of the February 2026 publication of updated estimates of housing need in Wales (which indicate
a substantial increase in both existing unmet housing need and newly arising need), and in the context of the existing under-delivery of units evidenced within the most recent LDP AMR (i.e. which identifies a shortfall in housing delivery of 27.3% on the adopted LDP target), it is considered essential that the overall growth levels for the Replacement Plan are revisited (and increased accordingly).

Policy HG1 KS1 – Land at North West Barry
Overall Support for Allocation

The detailed supporting information prepared on behalf of Persimmon Homes in relation to the Land at North West Barry site to date, including the masterplanning work undertaken in liaison with the Local Authority and their statutory consultees, has demonstrated that a sustainable, high-quality residential development which responds sensitively to both local character and landscape setting can be delivered on the site. It is considered that the allocation of Land at North West Barry (KS1) represents an entirely suitable housing allocation, which has been evidenced as being both viable and deliverable. The
inclusion of KS1 as a housing allocation in the Deposit Plan is therefore welcomed and supported.

Policy HG1 KS1 - Detailed Wording - Objections As stated, although the representations provide overarching support for the Deposit Plan and the inclusion of Land at North West Barry as an allocation, a number of detailed matters are objected to in relation to specific elements of the proposed KS1 policy wording.

It is acknowledged that the Key Site will need to be delivered in accordance with placemaking principles
(as set out in Policy SP4 Placemaking and Policy PGD1 Creating Well Designed Places), and masterplanning work to date has demonstrated that the site is fully capable for compliance with both Policy SP4 and PGD1.

Comments are provided on the additional requirements which the site is anticipated to comply with as set out at Policy HG1 KS1. Revised wording where required is identified in red.

• The provision of a minimum of 113 affordable housing units (30%) with a unit mix reflecting the requirements of the latest Local Housing Market Assessment and the Council's waiting list data.

In order to deliver a greater social mix, the affordable units should be dispersed across the site in clusters of no more than 10 units, The positioning of the affordable units will be informed by the experience and best-practice of the Registered Social Landlord responsible for the delivery and ongoing management of the units, with their delivery being phased across the development trajectory.

The policy as currently worded is considered to be overly prescriptive with regards to the positioning of affordable units on the site. It is the case the Registered Social Landlord who is responsible for the delivery and ongoing

operation/management of the affordable units is best-placed to advise upon the positioning of the affordable units within the site layout. As such, it is requested that the prescriptive nature of the above bullet point is mended to allow for the RSL to advise on best practice.

• Provision of land across the site frontage to allow for the widening of the A4226 Port Road West and the delivery of an Active Travel route across the frontage of the site as part of the Weycock Cross to Cardiff Airport Active Travel route, as identified in Policy TR1 (relating specifically to the delivery of the section of the Active Travel route adjoining the northern boundary of the Key Site only).

• Creation of a new signalised junction on to the A4226 Port Road West, which will need to accommodate controlled pedestrian/cycle crossing facilities.

With regards to the first two bullet points set out under the 'Sustainable Transport and Highways' section of the Policy HG1 KS1 (copied above), to confirm, as part of the development of the Key Site, it is proposed (as detailed within the submitted Transport Assessment) to construct a new junction from Port Road to the west of the Weycock Cross roundabout at the location of the existing field gated access in the form of a signal-controlled junction, which would allow for the safe and timely exit of traffic from
the development onto the local highway network. Such an access would also provide enhanced Active Travel infrastructure in conjunction with the proposed Active Travel route between the Weycock Cross junction and Cardiff Airport. Traffic signals at the proposed site access would provide for dedicated demand dependent green time for pedestrians and cyclists along this section of the A4226 Port Road.

Significant work has been undertaken to date in demonstrating that the above is deliverable. However,
it is requested that further clarification is included within the policy text to confirm that the Key Site is not responsible for the delivery of any further/additional sections of the Weycock Cross to Cardiff Airport Active Travel route, over and above the section of the route which adjoins the Key Site.

Suggested additional text is outlined in red above.
• A proportionate contribution towards off-site improvements to the capacity and flow of Weycock Cross roundabout and other junctions on the strategic highways network where necessary (in the context of the impact of wider committed developments on the strategic highway network).

As set out within the Transport Assessment (May 2025) prepared in support of the Key Site, the traffic movements associated with the North West Barry allocation could be accommodated on the highway network with a marginal and inconsequential impact on the conditions already experienced on the local highway network. An appraisal of the impact of committed development (as agreed with the Highways Authority) has been undertaken as part of the Transport Assessment, which identifies that committed
development within the vicinity of the Weycock Cross junction would have a greater impact upon the local highway network than the North West Barry Key Site. The North West Barry development is smaller in comparison to the other committed development assessed, and would have a marginal and inconsequential impact upon the operation of the Weycock Cross junction. It is therefore considered that the policy wording should be amended to reflect the 'proportionate' nature of contributions required.

Suggested additional text is outlined in red above.
• A contribution towards off-site sustainable transport measures in the area (as necessary and related to the Key Site).

Further clarification is required in regards to the above bullet point. It will be important to ensure that any off-site measures are directly related to the proposed development, and are necessary to ensure the acceptability of the proposed development. The requirement for a contribution towards off-site measures 'in the area' is not specific enough, and it is requested that the wording is amended as per the suggested text outlined in red above.

• The provision of a key area of open space (minimum 2.3 ha) to the south of the site adjoining Porthkerry Country Park which will serve as a buffer to the adjoining SINC at Mill Wood and offer opportunities for significant iodiversity enhancements. The ownership of this area should be
transferred to the Vale of Glamorgan Council, together with an appropriate financial contribution, for management as part of Porthkerry Country Park.

It is considered that the inclusion of a specified figure for the area of open space to be provided within the southern section of the site is unnecessary within the policy text.

The Indicative Plan for the Key Site included at Figure 13 of the Deposit Plan illustrates the indicative extent of 'Significant Open Space' to be provided adjoining Porthkerry Country Park, which will be subject to further detailed masterplanning work as the Planning Application is prepared in due course. A figure for the exact area
of open space to be provided within this section of the site cannot therefore be robustly specified until the further stages of masterplanning work are completed. As such, it is requested that the figure is removed from the policy text, with the identification of 'Significant Open Space' on Indicative Plan being considered satisfactory.

Furthermore, it is not considered appropriate that the policy wording should refer specifically to the financial contribution

towards the management of this land, in addition to its transfer, as such contributions will be subject to detailed viability appraisal work at the Planning Application stage.

Deposit Plan Appendix 1 - Housing Trajectory
The identified delivery timescales and quantum of units for the site as set out at Appendix 1 of the Deposit Plan (as copied below) are agreed with and considered to be suitable/deliverable:

2028-2029: 30 units
2029-2030: 60 units
2030-2031: 60 units
2031-2032: 60 units
2032-2033: 60 units
2033-2034: 60 units
2034-2035: 46 units

Persimmon Homes are committed to the delivery of the allocation, in accordance with the phasing trajectory outlined in the Deposit Plan. Further to the detailed submissions previously made, including extensive viability evidence which has been discussed in detail with the Local Authority and their viability consultant, it is confirmed that the site is viable and deliverable in accordance with the identified delivery timescales. It should be noted that there is a possibility that the number of units to be delivered within the first year (2028-2029) could be increased slightly, however, it is considered that the above presents a realistic trajectory for the site.

Deposit Plan Appendix 2 – Infrastructure Delivery Plan
A number of amendments to the text are requested in regard to the infrastructure requirements for KS1 North West Barry as set out within the Infrastructure Delivery Plan at Appendix 2 of the Deposit LDP.

Within the 'Key site issues and constraints' section of the Infrastructure Requirements table, the following amendments to the text are considered necessary:

• Proportionate access and junction arrangements on to the A4226 and a financial contribution towards strategic highway network enhancements (in the context of the impact of wider committed developments on the strategic highway network).

As set out above, it is important that the required financial contribution towards strategic highway network enhancements is proportionate to the scale of the North West Barry development, and that additional committed developments, which would have a greater impact on the strategic highway network, are considered in the round.

• Previous desk-based assessment and site visits dentified that development would have a major impact on five features (?), including important hedgerows which form historic boundaries. Archaeological features were also identified.

The above bullet point requires clarification as to the 'five features' which the development would have a 'major impact' upon. It should be noted that masterplanning work to date has been informed by extensive survey and assessment work which ensures that the proposed development is capable of addressing all constraints.

Within the section of the table where 'broad costs' of key infrastructure requirements are outlined, it is considered that the following amendments to the text are necessary:

• Education – Estimated Cost Circa £3,730,000 (£TBC)
It is considered that an estimated cost for education contributions cannot be specified at this stage, as the contribution will be directly related to current school capacity figures at the time of the Planning Application, with school capacities being fluid and subject to change. As such, the 'circa' figure should be removed from the text and replaced with 'TBC' at this point.

• A proportionate contribution towards on-site improvements to the capacity and flow of Weycock Cross roundabout and other junctions on the strategic highways network where necessary (in the context of the impact of wider committed developments on the strategic highway network).

• VOGC to deliver improvements to junctions on the Strategic Highways Network using s106 contributions (from the North West Barry Key Site and other relevant commitments) . As set out above, it is important that the required financial contribution towards strategic highway network enhancements is proportionate to the scale of the North West Barry development.

• Contribution towards off-site sustainable transport measures in the area as necessary and related to the Key Site.

As per the wording contained within the policy text of HG1 KS1, the requirement for a contribution towards off-site measures 'in the area' is not specific enough to provide certainty for the developer, and it will be important to ensure that any off-site measures are necessary and directly related to the North West Barry development.

• Community Facilities – Estimated Cost Circa £665,000 (£TBC) It is considered that an estimated cost for community facility contributions cannot be specified at this
stage – no background calculations are provided to evidence that this estimate is robust. As such, the 'circa' figure should be removed from the text and replaced with 'TBC' at this point.

Policy CC1 – Residential Operational Net Zero Carbon Development

Persimmon Homes has significant concerns regarding Policy CC1 and objects to it on the basis that it replicates requirements already being progressed at a national level through Welsh Government's Future Homes Standard (FHS). The FHS is intended to deliver "zero carbon ready" homes via a unified Building Regulations framework, making additional local policy unnecessary. At present, Building Regulations Part L1A sets out the standards for energy efficiency in new dwellings, and Persimmon
already designs its homes to go beyond these minimum thresholds. This includes enhanced insulation and improved building fabric performance, with reduced U values for elements such as walls, roofs, floors and windows to minimise heat loss. As a result, our homes typically achieve strong Energy Performance Certificate (EPC) ratings, generally in the A–B categories. Introducing further operational net zero requirements at a local planning level risks adding cost, complexity and uncertainty, potentially affecting the viability and deliverability of housing sites. The Development Plans Manual for Wales is clear that local plans should not repeat national policy or seek to regulate matters already addressed through other statutory regimes.

On that basis, Policy CC1 is not considered to be justified and is inconsistent with the second test of soundness. The proposed shift in standards from April 2030 represents a substantial and abrupt escalation in expectations. Although the policy refers to schemes such as Tai ar y Cyd and AECB CarbonLite, these examples largely relate to grant funded affordable housing projects. There is no robust evidence that equivalent standards can be met on mainstream housing sites without undermining overall viability. The Development Plans Manual requires policies to be based on strong evidence and to be realistically deliverable across the plan period. Without this, there is a risk that the proposed policy could impede
housing delivery and compromise the RLDP's ability to meet identified needs.

Policy CC1 could also lead to inconsistent energy performance requirements across Local Planning Authorities in Wales, contradicting the advantages of a unified regulatory system via Building Regulations. For volume housebuilders working across several authority areas, this would introduce unnecessary variation and complication. The DPM highlights the importance of policies that support housing delivery and avoid avoidable burdens. By introducing bespoke modelling thresholds and
operational monitoring requirements, CC1 risks blurring the line between planning and Building Control, raising questions about the policy's justification and practical application.

It is Persimmon's view that Policy CC1 is premature and that it is more appropriate for such matters to be addressed through building control rather than planning policy. In its current form, the policy risks impacting housing supply, affordable housing delivery and overall implementation across the plan period. For these reasons, we consider that Policy CC1 fails to satisfy the relevant tests of soundness and should be removed from the emerging RLDP.

Summary

As summarised above, and set out in full detail within the supporting survey/assessment work that has been provided to the Local Authority in relation to the site, the inclusion of Land at North West Barry as a Key Site (Policy HG1: KS1) with the Replacement Plan fully accords with the RLDP strategy. Furthermore, it is considered that (with the inclusion of the site), the Deposit Plan complies with the tests of soundness. Further to ongoing discussions with the Authority, we would reiterate the Site Promoter's commitment to delivering the allocation which has been evidenced as being entirely deliverable and viable
As set out within this representation, overall support is provided for the Deposit Plan (and the inclusion of North West Barry as a Key Site), however, as detailed, bjections are submitted in relation to the specific elements of the proposed wording of the Key Site policy (SP4: KS1).

We look forward to the RLDP progressing towards examination, and would welcome the opportunity to
take part in the relevant Hearing Sessions (in relation to Policy HG1: KS1, and wider strategic policies as required). Please do not hesitate to contact me should you require any further detail or wish to discuss any aspect of the representations.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Persimmon Submission - https://valeofglamorgan.oc2.uk/a/367

6714 Comment

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'. Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains.

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning guidance (SPG) proposed. We are keen to ensure that these SPG's are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are involved in the development of some of these. The content and application of the SPG's will be fundamental to the effectiveness of several of the policies identified in the deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: "The Local Development Plan will support resilient and sustainable local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part of sustainable growth."

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

"Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other opportunities for local food production as part of multifunctional green infrastructure."

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

6.54 We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live
full, productive and prosperous lives.'

6.60 We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid
HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to
ensure Developers submit a quality HIA and implement the conclusions.

6.61 Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

6.62 Wales Health Impact Assessment Support Unit has recently released guidance on HIA - see https://phwwhocc.co.uk/whiasu/ for more information and toolkits to ensure most up to date is in use.

6.63 Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the community..'.

6.65 Suggestion to change wording from 'encouraged' to 'expected' for example:
Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement
for HIA will assist with this expectation.

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference “enhancements to leisure, sport and recreation spaces”. Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation. It is recommended that the Key Site schedules include minimum on-site provision standards and delivery
phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population
growth.

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail
centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer
supply chains. This limits opportunities for strengthening local food economies.
It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for ‘local affordable food’ outlined in SP5.

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach.”

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to
consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and
Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: “Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food
infrastructure within walking distance of new residential areas.” This addresses diet related health inequalities, encourages healthier communities and aligns with HIA
guidance.

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply
chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable
agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models.

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate

rural employment uses - to include the following wording: “Rural diversification proposals that support agro-ecological farming, sustainable local food production,
community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations.”

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel
Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022
01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing
flooding and making use more comfortable during hot weather (such as shading from trees). We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

SP13 Community infrastructure and planning obligations:

We want to take this opportunity to highlight the challenges that population growth places on healthcare
services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure. Please refer to the information provided as part of the background evidence paper titled 'BP37
Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within
existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new
developments to take forward its strategic objectives.

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space Assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres. Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.”
There is no reference to the expectation that local communities are consulted in relation to the development of community facilities. We would like to see a
requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and
challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities
that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales’ push for local supply resilience, this is a major opportunity gap. Consider including the following wording:

“Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains.” This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or
urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: “Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing.”

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food
production, short supply chains or sustainable farming practices.
Consider including the following wording: “Development proposals should encourage short supply chains, low-carbon farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives.”

Change suggested by respondent:

Suggested wording includes:
"The Local Development Plan will support resilient and sustainable local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part of sustainable growth."

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

6736 Support

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Hallam Land Management [854]
Agent: Savills

Summary:

Hallam are generally supportive of the aims of this policy. The strategy of focusing new housing in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity is wholly supported. St Athan is clearly already a sustainable location for growth and its sustainability and connectivity have clear potential to enhance alongside further development. The delivery of growth in St Athan is therefore considered to firmly align with the RLDP's strategy.

Full text:

1.1. Savills is instructed by Hallam Land ('Hallam') to respond to the consultation on the Deposit version of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').
1.2. Hallam is the strategic land arm of Henry Boot PLC and is one of the UK's most well established and successful land promoters. Hallam operates throughout England, Scotland and Wales from 7 regional offices working with landowners, developers, local authorities, communities and other parties to bring forward development opportunities. Hallam has been in operation since 1990, specialising in obtaining planning permission and delivering development larger schemes including new communities and urban extensions.
Background to Representations
1.3. The Preferred Strategy was published in November 2023. The Preferred Strategy identified "Land West of St Athan" and "Land South of the B4265, St Athan" (Site IDs 456 and 457) as one of five Key Sites in the Preferred Strategy. Both of these sites are under the control of Hallam and were submitted as part of the Call for Sites. A site-specific illustrative masterplan and policy wording were provided under Policy SP4 KS5 (Land to the West of St Athan).
1.4. Hallam submitted representations on the consultation on the Preferred Strategy. These representations were very much supportive of the identification of "Land to the West of St Athan" as a Key Site and the approach that was taken more generally taken in the Preferred Strategy.
Approach to Responding to Consultation
1.5. The VoG has published the Deposit version of the RLDP. The Deposit is the first version of the RLDP to include emerging allocations, and detailed development management policies, as well as a Proposals Map. It is accompanied by a substantial evidence base which includes various supporting technical documentation submitted as part of the promotion of the allocated sites.
1.6. Building upon the Preferred Strategy, the Deposit RLDP proposes to allocate Land to the West of St Athan as a Key Site. The site is identified under Policy HG1 KS5 (Land to the West of St Athan) as key mixed-use site with capacity for 600 new homes alongside new community and commercial facilities.
1.7. Hallam's representation to this consultation broadly splits into three separate sections:
• It offers general support for the housing requirement, growth strategy and settlement hierarchy. This is covered in Chapter 2 of this Statement;
• It wholly supports the approach of allocating Land to the West of St Athan as part of the Deposit RLDP whilst also providing detailed commentary on the specific wording of Policy HG1 KS5 (Land to the West of St Athan). This is covered in Chapter 3 of this Statement; and
• It provides commentary on a range of development management policies. This is covered in Chapters 4, 5, 6, and 7 of this Statement.
1.8. As well as this Statement, Savills has provided commentary on these specific policies under the VoG's consultation website.

Policy SP1 (Sustainable Growth Strategy), Policy SP2 (Settlement Hierarchy), and Policy SP6 (Housing Requirement)
2.1. Together, these policies have the effect of:
• Setting the housing requirement to be delivered over the RLDP plan period of 7,890 homes with a flexibility allowance applied on top so that provision is made for a total of 8,660 homes. This is the same housing requirement to that included in the Preferred Strategy which was found by Welsh Government to be in conformity with Future Wales (Policies SP1 and SP6);
• Identifying the extent of the Strategic Growth Area as the primary focus of new housing growth. Concentrations of new housing are focussed in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity. St Athan is a specifically named settlement within the Strategic Growth Area (Policy SP1); and

• Identifying St Athan as a Primary Settlement in the third tier of the settlement hierarchy. This is the same tier of the settlement hierarchy as St Athan is in the adopted LDP (Policy SP2).
2.2. Hallam are generally supportive of the aims of these three policies.
2.3. They recognise that the housing requirement has been subject to extensive scrutiny and been found to be appropriate by Welsh Government in response to the Preferred Strategy. In that sense, there is nothing further for Hallam Land to comment upon here other than to note that it should reasonably be seen as the minimum number of homes that the RLDP should be aiming to deliver, particularly following the publication of the 2022-based household projections between Welsh Government's comments on the Preferred strategy and the publication of the Preferred Strategy.
2.4. The strategy – of focussing new housing in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity – is wholly supported. St Athan is clearly already a sustainable location for growth and its sustainability and connectivity have clear potential to enhance alongside further development. The delivery of growth in St Athan is therefore considered to firmly align with the RLDP's strategy.
2.5. The continued positioning of St Athan as a Primary Settlement in the third tier of the settlement hierarchy is considered appropriate though clearly the delivery of two Key Sites within St Athan as part of the RLDP has the potential to further elevate its position in the future. This is reflected in Table 10 of Background Paper 5 Settlement Appraisal Review where St Athan is given one of the higher scores of the Primary settlements.

Policy HG1 KS5 (Land to the West of St Athan)
3.1. Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.
3.2. There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.
3.3. The relevant policy for Land to the West of St Athan is Policy HG1 KS5.
3.4. As a starting point, Hallam wholeheartedly support the allocation of Land to the West of St Athan as a Key Site within the RLDP. Hallam made a comprehensive submission as part of the Call for Sites stage and since then have worked proactively with the VoG and other stakeholders to demonstrate that the site is suitable, deliverable, and viable. It's identification as a Key Site in the Deposit RLDP represents extensive and thorough assessment – its proposed allocated is therefore considered to be sound and firmly evidence based.
3.5. So that the policy functions as effectively as possible, Hallam has a small number of comments and included at Appendix A is a re-worded version of Policy HG1 KS5 which incorporates those changes with text suggested to be removed crossed through and text to be added shown underlined.
3.6. These proposed adjustments are considered in turn below and are structured around the sub-headings that are contained within the policy wording itself.
Site Capacity and Housing Trajectory
3.7. Extensive environmental and technical work has been undertaken by Hallam to support the promotion of the site and the development of a masterplan (and site capacity) that responds to the site's constraints and opportunities.
3.8. That said, Hallam is not a housebuilder and once an outline planning application has progressed, Hallam will identify a development partner (which could be a single or multiple housebuilders / housing associations). Clearly different housebuilders have different house types and differing approaches to density.
3.9. In addition, whilst a lot of technical and environmental work has been undertaken to date, clearly further technical work would be submitted at planning application stage which would further validate the site's capacity.
3.10. Legislative and guidance changes also have the potential to impact a site capacity. Whilst the masterplanning process has been prepared to be SAB compliant, the impact of the introduction of the requirement to secure SAB approval has had an impact on site capacity and it follows that a further, and as yet unknown, legislative or guidance change could have a similar impact.
3.11. This is not to suggest that there isn't a high degree of confidence that the site can deliver roughly 600 homes, rather that Hallam suggest that the word 'approximately' is added to the policy wording to reflect the potential for a degree of deviation (which could be upwards or downwards).
3.12. Background Paper 9A Housing Land Supply and Housing Trajectory sets out the anticipated annual delivery rates for housing over the RLDP. With regards to the ability of the site to deliver the number of homes it is allocated for in the RLDP plan period, the housing trajectory for the site reflects that the first completion date was pushed back from 2027/2028 to 2028/2029 since the consultation on the Preferred Strategy. This means that the whole site continues to be shown as being delivered within the RLDP plan period.
3.13. Hallam support and agree with the approach set out in the Draft Housing Trajectory and see it to be realistic and achievable based on their experience and subject to usual caveats around the condition of the market, RLDP progression, and swift determination of a planning application.
Affordable Housing
3.14. At present, Policy HG1 KS5 (like all of the standalone policies for the other four Key Sites), states that the site should provide a minimum of 210 affordable housing units. This figure is derived from 35% of the number of homes that the site is allocated for (600 homes).
3.15. Worded at present, a strict interpretation of this policy could be that 210 affordable units must be provided onsite

regardless of the total number of homes that are proposed. For example, it could be interpreted as requiring a fixed number of affordable homes of 210 homes, even if the total number of homes that are proposed on the site is fewer than the 600 homes that the site is allocated for or, conversely, that only 210 homes should be delivered as affordable if more than 600 homes were to be delivered and the RLDP allocation exceeded.
3.16. Hallam recognise that this is not what the policy wording is seeking to achieve (and their viability work for the site is based on the site delivering 600 homes of which 35% are affordable) but suggest that its wording could be clarified by removing reference to a specific number of affordable homes for the site to deliver in favour of just the affordable housing percentage being noted in the policy.
3.17. Hallam also suggest that the requirement for affordable housing units to not be in clusters of more than 10 homes is removed and that the approach is for this to be considered on a site by site and case by case basis and with recognition that Policy HG5 (Affordable Housing Exception Sites) which can provide a framework for 100% affordable sites of more than 10 homes to be delivered. As an example, and in the case of Land to the West of St Athan, the "Land South of the B4265, St Athan" (Site ID 457) portion of the site is likely better suited to a mixed-use development alongside the future St Athan Railway Sation. This portion of the site is probably better suited to a flatted form of development (either above non-residential uses or as a block) which tend to be delivered as 100% affordable housing developments rather than comprising a mix of private and affordable housing.
Sustainable Transport and Highways
3.18. This part of the policy sets out expectations relating to sustainable transport and highways and there are a number of matters which Hallam wish to comment on.
3.19. As a starting point, Hallam support the delivery of St Athan Railway Station and therefore commits to its safeguarding. Likewise, Hallam recognise the potential suitability for the "Land Between the Railway Line and B4265, St Athan" (Site ID 458) site to accommodate a Welsh-Medium Secondary School and can also therefore commit to safeguarding land for the delivery of a pedestrian and cycle bridge over the railway line. Specific comments on Policy TR1 (Transport Proposals) and Policy CI3 (New Community Facilities) are made elsewhere in this Statement.
3.20. With regards to the Sustainable Transport and Highways section of Policy HG1 KS5, Hallam's overall position is that a careful balance needs to be reached between the policy wording being explicit as to what highway works must be delivered and reserving consideration of this until planning application stage where the exact site capacity is better understood and a full Transport Assessment submitted.
3.21. At present, Hallam's view is that the policy wording is overly explicit and suggest that it could be qualified through the addition of the following text before listing the offsite highways improvements:
'Subject to the Strategic Transport Assessment and site-specific Transport Assessment submitted at planning application stage'.
3.22. Turning to the specific offsite highways measures that are listed within the policy wording, Hallam have four comments.
3.23. Firstly, it is suggested that the delivery of an active travel link along the B4265 between the site entrance and the Gileston Road junction should be secured via a financial contribution that is pooled with KS4 Church Farm. This reflects that the delivery of this link not only links Hallam's site to other services in St Athan but also linking KS4 Church Farm to the services that are proposed and uses for which land is safeguarded within Hallam's site. Clearly this is also to the benefit of existing residents of St Athan. This would reflect the approach that is proposed to be taking for the pooling of Section 106 monies for the delivery of an active travel route between St Athan and Llantwit Major.
3.24. Secondly, Hallam flag the need for the RLDP to be sufficiently flexible with regards to the delivery of an active travel link between St Athan and Llantwit Major. Ultimately, the purpose of delivering this active travel route would be to provide a connection from St Athan to Llantwit Major Railway Station and the delivery of a Railway Station in St Athan would remove the necessity of delivering this active travel connection. Hallam's suggested amendments to the policy wording seeks to reflect this.
3.25. Thirdly, Hallam have been consistent in highlighting that, whilst there is an aspiration to deliver an improved pedestrian link along Llantwit Road, a combination of the road width and the extent of third party ownerships make delivering a continuous link very challenging with a pragmatic approach instead needing to take place that recognises the ability to deliver betterments but acknowledges that delivering a continuous link is unlikely to be possible. Hallam has suggested additional wording to clarify this.
3.26. Fourthly, Hallam highlight that the designing of a loop road within the site to facilitate access by a bus may be superfluous and represent an over-engineered solution given the potential for the St Athan Transport Interchange that land is safeguarded for under Policy TR1 (Transport Proposals) is envisaged to accommodate infrastructure to accommodate a bus connection. On that basis, it is suggested that the following clause is added to the policy wording to reflect that bus connectivity to the site may be delivered not via an internal bus loop:
'Subject to progress on the St Athan Transport Interchange as land is safeguarded for under Policy TR1 (Transport Proposals)'
Community Infrastructure
3.27. There are three points which Hallam wish to make in connection to this element of Policy HG1 KS5.
3.28. Firstly, Hallam suggest that the wording of the part of the policy relating to financial contributions to fund the delivery of additional school places needs to be adjusted. At present this part of the policy is worded as if there is an automatic requirement to provide Section 106 monies for school places where Circular 13/97 is clear that a contribution should only be sought where the schools do not have current projected capacity to accommodate the new children from the development. Hallam's proposed adjustments seek to ensure that this part of the policy reflects this though note that Background Paper 43 Education forecasts a need for a financial contribution to be made for additional school places at all English and Welsh primary and secondary schools that the site is within the catchment of.
3.29. Secondly, Hallam note that Table 10 of Background Paper 34 Community Facilities identifies an existing over-provision of community space within the St Athan Ward of 778sqm and a surplus of 531sqm of community floorspace

at 2036 when the level of housing to be allocated in the Deposit RLDP is delivered. It is understood that this is on the basis of no community floorspace being delivered as part of Hallam's proposals or as part of the KS4 Church Farm site. Hallam suggest that the wording of this element of the policy needs to reflect that community floorspace should only be required to be provided in the case of a local shortage in provision. Aligned to this, Hallam also suggest that the reference to specifically providing a 'community building' is adjusted to instead make reference to 'community space'. This reflects that the community space element of scheme, if indeed it is actually required, could be a part of a larger mixed-use building (probably in the Mixed-Use / Community area) rather than as a standalone building.
3.30. Thirdly, Hallam note the error in the wording of the sixth bullet point under the 'Sustainable Transport and Highways' heading where reference is made to the safeguarding of land on the southern side of the railway line as being identified in Policy CI3(2) where-as it should be Policy CI3(6). This is a minor amendment that should be made to ensure consistency.
Green Infrastructure, Recreation Spaces, and Biodiversity
3.31. The masterplan prepared by PAD Design and submitted by Hallam shows the site delivering a mix of public open space and green infrastructure including the provision of allotments, a Neighbourhood Equipped Area of Play, a Local Equipped Area of Play, and a sports pitch. This is welcomed in Background Paper 32A Green Infrastructure Assessment of Key Sites which, at Paragraph 5.55 recognises that a 'ground up' approach has been taken in the masterplanning approach.
3.32. This is shown indicatively to illustrate the composition of public open space and green infrastructure that the site could provide alongside the other elements of built development that the site is allocated and the masterplan makes provision for.
3.33. Whilst, Hallam recognise the need to provide public open space, the starting point for this should be the Fields In Trust Standards and Hallam therefore suggest an approach where the policy wording is not specific about what forms this should take.

Policy TR1 (Transport Proposals)
4.1. This policy identifies three active travel routes and two public transport schemes that the Deposit RLDP safeguards land for, as well as three highway improvement schemes that are identified as being required to mitigate the impact of development. Two of these are in St Athan – one being the St Athan Transport Interchange for which land is safeguarded for and the second being the Gileston Road Junction which is identified as a required highway improvement. Both are considered in turn below.
St Athan Transport Interchange
4.2. Hallam support the safeguarding of land for the St Athan Transport Interchange and see that its delivery would be to the benefit of the Key Site itself but also more broadly to St Athan and western parts of the VoG.
4.3. It is clear from discussions with Transport for Wales that there is a strong business case for the delivery of a railway station and that the creation of "critical mass" through residential development around it has a key role in driving its delivery, as does the nationally significant economic role that the Bro Tathan Enterprise Zone has and the Aberthaw Green Energy Park will have. The proximity of St Athan to both of these hubs clearly contributes to its fundamental sustainability and suitability for growth whilst the further development of a critical mass of housing and employment generating uses will further support linkages between them and strengthen the business case for a new railway station at St Athan. This is reflected in TFW's 'Today, Tomorrow, Together: A Vision for Rail Across Wales and the Borders' which confirms that the delivery of St Athan Railway Station remains in TFW's pipeline which has been endorsed by the Westminster Government.
4.4. The location that is identified on the Proposals Map is Transport for Wales' preferred location within the site and has been incorporated into the masterplanning approach which seeks to create a node around it by incorporating a bus interchange and a mix of uses.
4.5. At present, the Proposals Map identifies the location of the Railway Station using a red star which is positioned on the railway line itself but without the required land take not spatially being defined.
4.6. Whilst Hallam recognise that the exact land take required will need to be refined further through discussion with TFW, it may be the case that the mixed-use element on this portion of the site comes forward before the Railway Station.
4.7. The early delivery of these elements should be welcomed as clearly the mixed-use element both enhances the range of services and facilities in St Athan but also would mean that the Railway Station is integrated upon delivery.
4.8. On that basis, it is imperative that the safeguarding of land for the Transport Interchange is limited only to that land required to deliver the Transport Interchange and is done in such a way such the safeguarding does not sterilise non-transport related development from this portion of the site until the Railway Station has been delivered.
Gileston Road Junction, St Athan
4.9. Paragraphs 6.199 and 6.200 relate to the expectation that vehicle trips as a result of RLDP allocations in St Athan are anticipated to trigger the need to upgrade the Gileston Road Junction to a signal-controlled arrangement. This is informed by the conclusions of Table 3 of the Strategic Transport Assessment which forecasts that the junction will be operating above capacity during both the weekday AM and PM peak by the RLDP's end point.
4.10. Hallam note that Technical Note 08 of the Strategic Transport Assessment identifies that the improvements to the Gileston Road Junction are to be delivered by VoG and funded through financial contributions from seven sites that the RLDP proposes to allocate.
4.11. Improvements to this junction are to be funded by a number of sites; however it is unclear whether (and if so, when) forward funding will be secured by the Council and clearly there cannot be a situation where none of the sites can deliver homes until strategic highways works are funded / completed. We therefore seek further clarification over the phasing of these works and note that early delivery of homes ahead of strategic highway improvements is likely to be important for deliverability of each strategic site.
4.12. To respond to Hallam's above comments, one approach could be for references to highway improvement works to

be entirely removed from this policy or, if they are to remain, that qualifying text is added to note that the need for and format of any improvements will be subject to detailed consideration at planning application stage and that such contributions must be justified in planning terms, particularly where (in the case of Pen Y Turnpike Road and Waycock Cross for Land to the West of St Athan), the distance from a site and the junction to be improved is significant and therefore thee number of vehicle trips that would be generated modest.
4.13. This aligns with Hallam's suggested approach to the specific wording of Policy HG1 KS5.

Policy CI1 (Open Space Provision)
5.1. This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.
5.2. Hallam note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.
5.3. Hallam is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter.

Policy CI3 (New Community Facilities)
6.1. As well as allocating land for five new or improved education developments, this policy safeguards 'Land South of the Railway Line, St Athan' for the delivery of a Welsh-medium secondary school.
6.2. This policy is clearly of interest to Hallam because Paragraph 6.250 places a requirement for the safeguarding of land on the northern side of the railway line on their Land to the West of St Athan Key Site for a footbridge to land on.
6.3. With the policy wording being intentionally light-touch, Paragraph 6.250 of the Deposit RLDP provides greater detail about the safeguarding of this land (and other paragraphs in the Deposit RLDP relate to other community facilities that Policy CI3 covers). It effectively does two things.
6.4. Firstly, it notes that the delivery of this school will require active travel improvements including the safeguarding of land for a pedestrian and cyclist footbridge over the railway line.
6.5. Secondly, it is clear that the safeguarding of this land is in response to a forecast increase in demand for Welsh-medium secondary school places across the whole of the VoG as a result of expanded capacity at Welsh-medium primary schools across the VoG. On this basis, it follows that this location has been selected as a preferred location because of its ability to serve the wider sub-region.
6.6. Hallam recognise that this site could be a suitable location for a Welsh Medium Secondary School and, as a principle, is agreeable to the safeguarding of land for the footbridge landing on the northern side of the railway line.
6.7. Paragraph 6.250 of the Deposit RLDP is clear that the delivery of a Welsh-Medium secondary school is in response to a regional / sub-regional demand rather than a local need as a result generated either by the development of Land West of St Athan or other emerging allocations within St Athan and it cannot be the case that Hallam are expected to make disproportionate contributions to either the delivery of the school or required active travel improvements just because they have control of the site or that it is next to the Key Site.

Policy CC1 (Residential Operational Net Zero Carbon Development)
7.1. The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) before the policy wording sets out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.
7.2. As a starting point, Hallam share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) can present challenges. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this will result in an uneven framework for housebuilders, significantly adding cost and reducing certainty.
7.3. The justification for using planning policy to set requirements exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.
7.4. There are two points to be made by Hallam here:
7.5. Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage that such an approach would not be sound. This Written Ministerial Statement was subject to an unsuccessful judicial review.
7.6. Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations. Where there are existing Local Plans in England that take this approach, they do not align with the Westminster Government's position and there will be no Local Plans emerging including such policies.
7.7. Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking

into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs (Bridgend and Merthyr Tydfil) do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound at Examination stage.
7.8. Secondly, Hallam have concerns with the approach that has been taken with regards to viability.
7.9. From Hallam's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.
7.10. As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated. This is important as it demonstrates that, whilst Hallam do not believe such a policy approach should be taken, the development of the site at the time of the completion of the Development Viability Model for the site is viable whilst meeting the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development).
7.11. Hallam's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. This concern is particularly exacerbated by the fact that, as recognised at Paragraph 6.47 of Background Paper 42 Viability Assessment, takes the lowest estimate for the works required to achieve these policy expectations, Savills' experience – both that of their development land team based in Wales and their environmental sustainability team based across England - is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.
7.12. Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy DNP3 (Glamorgan Heritage Coast)
8.1. This policy relates to the Glamorgan Heritage Coast, identifying a series of land uses that are permissible within the policy area before setting three tests that must be satisfied for development within the Glamorgan Heritage Coast to be permissible where there is an adverse environmental impact.
8.2. Hallam note that the 'Land South of the B4265, St Athan' portion of the land that they control is both proposed to be retained as part of the Glamorgan Heritage Coast (a continuation of the position taken in the adopted LDP) whilst also forming part of the Land to the West of St Athan Key Site where the masterplan at Figure 17 shows it as accommodating the potential new railway station and a mixed-use area (including car parking).
8.3. The relevant extract of the Proposals Map is replicated below:
8.4. The exact composition of the buildings proposed on this portion will require further refinement and will need to be driven by occupier requirements, but the masterplanning work undertaken by pad Design envisages that they could provide a mix of retail and food and drink uses most likely across some or all of the ground floor, alongside workshop, co-working or office incubator space at upper floor levels and perhaps at ground floor level. There could also be the potential for additional homes, likely in the form of apartments at upper floors, as part of a mix of uses. It is realistic therefore to anticipate that this portion of the site will accommodate buildings of up to three or four storeys with a high plot ratio to reflect the uses and supporting infrastructure that it is to accommodate.
8.5. Hallam's position is that the continued inclusion of this parcel of land as part of the wider Glamorgan Heritage Coast is inappropriate for two reasons.
8.6. Firstly, and its most basic level, the approach of allocating the site for development whilst retaining a designation that inherently seeks to restrict the type, form, and quantum of development, is wholly contradictory.
8.7. Designation of this portion of the site as part of the Glamorgan Heritage Coast will mean, given that the uses that Figure 17 envisages as being delivered on the site are not those that the first part of Policy DNP3 (Glamorgan Heritage Coast) allows for, any application for development will need to demonstrate that there is a compelling need for the development, that the benefits outweigh the harm, and that appropriate mitigation measures are in place. This the potential to prejudice its development or, at very least, greatly impact how it is developed whilst requiring.
8.8. Secondly, it is difficult to see how this land warrants ongoing inclusion within the designated Glamorgan Heritage Coast. This is something that is considered in more detail in the Review of Landscape Character and Visual Amenity (December 2022) prepared by FPCR and submitted as part of the Call for Sites (and also available as part of the consultation on the Deposit RLDP as a piece of Key Site Supporting Information). Paragraph 5.13 of the FPCR document concludes on this piece of land that:
'Through the fieldwork it is considered that the Site does not display any "special environmental qualities" identified by the Policy and plays no intrinsic role in the Policy designation, as it is effectively forms a rather ordinary grazing field. It is influenced by the urbanising elements of the adjacent B4265, the Railway Line, the Tarmac Cement works, and to some degree the built edge of St Athan. Furthermore, it is bound and contained by trees and woodland beside the railway line, which prevents wider intervisibility with the coastline.'
8.9. Taking the above together, Hallam suggest that the preparation of the RLDP provides the opportunity to define the extent of the Glamorgan Heritage Coast to respond to both the landscape value of certain sites but also the wider aspirations of the RLDP. If it is not within the gift of VoG to redefine the boundaries of the Glamorgan Heritage Coast through the RLDP then Hallam suggest that an additional element could be added to this policy to confirm that it does not apply to land which is allocated for development.

Appendix A - rewording of Policy HG1 KS5

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3y3

6818 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mr Ian Fairweather [1225]

Agent: Boyer Planning

Summary:

There is concern that the proposed primary focus of housing growth within the Vale being within the Strategic Growth Area. Limiting development at suitable settlements outside the Strategic Growth Area is not the correct approach and greater flexibility is required to deliver the housing need. Clearly there is a requirement to provide further allocations in sustainable Minor Rural settlements identified as being 'Outside of the Strategic Growth Area' – namely St Nicholas.

Full text:

The Spinney, St Nicholas (Site Ref: 460)
Boyer have prepared the following representation on behalf of Mr Fairweather in response to the current Vale of Glamorgan Replacement Local Development Plan (RLDP) 2021-2036 Deposit Plan Consultation.

A summary of our main representations is as follows:
• Significant concern is raised regarding the lack of residential allocations within the Minor Rural Settlements, in particular St Nicholas.
• Concern regarding the overall housing requirement and the need for an increased flexibility allowance.
• Questions asked regarding the spatial distribution and the lack of other allocations to provide a range and choice of housing.
• Confirmation of the limited constraints for The Spinney, St Nicholas (Site Ref: 460).
• Review of the Candidate Site Assessment; and
• Need to review the Settlement Boundary of St Nicholas.

SP1: Sustainable Growth Strategy
Whilst Policy SP1 outlines the housing delivery requirement (addressed under the response to SP6), the main concern for Mr Fairweather is the proposed primary focus of housing growth within the Vale being within the Strategic Growth Area. Whilst it is understood and supported by Mr Fairweather that new housing developments would be concentrated in locations which are served by existing public transport routes and provide the opportunity to enhance sustainable transport connectivity, it is shortsighted to concentrate this growth specifically along the railway line. The justification being that those settlements identified as being 'Outside of the Strategic Growth Area' – including St Nicholas, are equally as important as those within. St Nicholas is a sustainable location and located on an important public transport route (A48) and is well served by bus transport.

The principle of locating development at sustainable settlement is supported, however Mr Fairweather considered that limiting development at suitable settlements outside the Strategic Growth Area is not the correct approach and that greater flexibility is required to deliver the housing need. Currently under Policies HG1 and HG4, the only allocations in any Minor Rural Settlements amount to 122 dwellings in total (excluding any from St Nicholas). This also needs to be considered in the context of the 1,303 dwellings expected from large and small windfall developments. Clearly there is a requirement to provide further allocations in sustainable Minor Rural settlements identified as being 'Outside of the Strategic Growth Area' – namely St Nicholas.

In context of above, Mr Fairweather strongly recommends that appropriate consideration is given to the widening of the Strategic Growth Areas to include St Nicholas as a sustainable settlement which is capable of accommodating a new allocation at The Spinney (Site Ref: 460).

SP2: Settlement Hierarchy
Mr Fairweather previously supported the identification of St Nicholas as a Minor Rural Settlement and acknowledged its capacity to accommodate proportionate and sustainable growth, particularly given its accessibility and relationship with Cardiff to the east and access to Bridgend to the West. The Deposit Plan retains St Nicholas within the Minor Rural Settlement tier, however, does confirm that the settlement is outside the Strategic Growth Area.

Whilst the overarching principle of directing growth to the most sustainable settlements is supported, the Plan does not clearly demonstrate why settlements that are well connected and functionally related to larger centres, such as St Nicholas, should be subject to such constrained growth.

In this context, Mr Fairweather highlights Paragraph 3.10 which indicates that Minor Rural Settlements provide an 'important range of services and facilities that play a functional role in meeting some of the basic needs of residents within rural areas, reducing the need to travel'.

Building upon this, Policy SP2 does highlight that 'Minor Rural Settlements identified will be limited to the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments'.

Furthermore, the supporting text to Policy SP2 (Paragraph 6.17) confirms that 'those settlements that are considered to have sufficient population, services, and facilities to accommodate small scale growth without it having a detrimental impact on their existing character and local environment'.

This all buildings upon the identified importance of Minor Rural Settlements within the Preferred Strategy which outlined in Paragraph 6.50 that it is 'essential for the LDP to balance the growth in a way that supports the need of rural communities' and whilst it is evident that within these settlements 'general market housing will be limited to opportunities including infill' (Paragraph 6.51), the enabling of an element of 'open market housing will provide opportunities for the delivery of affordable housing reflecting the aspirations of rural communities to sustain their housing needs' (Paragraph 6.51). This importance of Minor Rural Settlements needs to be carried more strongly forward in the Deposit Plan.

Moreover, the evidence base does not sufficiently justify the degree of restriction now applied, nor does it explain why proportionate additional growth in appropriate Minor Rural Settlements would undermine the spatial strategy. As drafted, the policy risks limiting flexibility in the distribution of housing across the Vale. Accordingly, it is considered that the approach to St Nicholas under Policy SP2 is not justified.

Clearly there continues to be a disconnect between the identified role and function of St Nicholas, which is supported, and the actual ability to deliver the appropriate range and choice of dwellings in the rural settlements. For example, The Spinney, St Nicholas (Site Ref: 460) is considered to naturally round-off the existing boundary, enclosing the envelope of development, without encroaching or sprawling beyond the existing line of built form, in a sustainable location which can accommodate an appropriate allocation.

SP6: Housing Requirement
As per Mr Fairweather's previous comments to the Preferred Strategy, the concerns regarding a need for a higher housing level and the need for development to be appropriate placed in sustainable allocations in a settlement in which people want to live is still relevant.

Currently Policy SP6 establishes the overall housing requirement and applies a 10% flexibility allowance. The Policy suggests that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes and this will be delivered by:
• 3,837 dwellings from the existing land supply
• 3,520 dwellings on allocated sites
• 1,303 dwellings from large and small windfall developments

As per previous representations, Mr Fairweather considers that it's important to take account of recent guidance provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan. For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
More recently in Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery.
Applying the same approach to other current Local Development Plans, it is evident that a flexible housing allowance above the current 10% threshold will be required. Having reviewed the Council's evidence base Mr Fairweather considered that a minimum allowance of 15% would be reflective of the County's growth aspirations and would seek an additional circa 400 dwellings (equating to a housing requirement of 9,074 dwellings inclusive of the 15% flexibility).

To accommodate this increased in flexibility allowance and over all housing numbers, it should be outlined that smaller sites typically deliver more quickly, are less infrastructure-dependent, and increase build-out rates through diversification. The Spinney represents precisely the type of deliverable site that should form part of an enhanced flexibility allowance.

Policy SP6 should therefore be amended to increase the flexibility margin to up to 15%, with consequential allocation of additional small and medium-sized sites.
HG1: Housing Allocations Table 3 spatial distribution
Mr Fairweather does not comment on any of the proposed housing allocations, however, does highlight that the delivery in incumbent upon a number of larger strategic sites, and that to allow a greater range and choice then smaller

allocations in the Minor Rural Settlements. Only 161 units are proposed on smaller allocated sites, equating to approximately 7% of newly allocated supply.
In the context of the above, there remains significant concern that the spatial strategy continues to exclude allocations within Minor Rural Settlements, including St Nicholas.

The Plan recognises that Minor Rural Settlements provide an important range of services and facilities and play a functional role in meeting the needs of residents within rural areas. It further acknowledges that it is essential for the LDP to balance growth in a way that supports rural communities. Whilst general market housing is described as being limited to infill opportunities, the Plan also recognises that enabling an element of open market housing provides opportunities for the delivery of affordable housing and helps sustain rural communities.

There is therefore a clear disconnect between the identified role and function of settlements such as St Nicholas and the absence of any allocated sites (excluding the affordable led schemes under Policy HG4) capable of delivering an appropriate range and choice of dwellings. The strategy effectively restricts development to windfall and infill, without positively identifying opportunities that would logically consolidate and strengthen the settlement.

This approach is inconsistent with the settlement's accessibility and functional role. St Nicholas is:
• Well connected to the A48 strategic highway network.
• Served by bus routes within close proximity to the site.
• Within commuting distance of Cardiff and Cowbridge.
• A sustainable and established residential community.

Land adjoining The Spinney, St Nicholas (Site Ref: 460) represents a contained and sustainable opportunity that naturally rounds off the existing settlement boundary. The site encloses the envelope of development without encroaching into open countryside or extending beyond the established line of built form. It is well related to existing services and infrastructure and is capable of accommodating a modest allocation consistent with the scale and character of the village.

A proportionate allocation at this location would align with the stated objectives of supporting rural communities, enabling a mix of market and affordable housing, and providing genuine choice within Minor Rural Settlements. The continued absence of such allocations undermines the internal consistency of the spatial strategy.
Furthermore, the strategy places substantial emphasis on rail-based corridors. Whilst development near rail infrastructure is supported in principle, sustainable growth should not be exclusively rail-led. Strategic highway connectivity and bus accessibility also represent legitimate and sustainable locational advantages.

The complete absence of allocations in Minor Rural Settlements creates an imbalance in distribution and limits housing choice. A modest allocation at The Spinney would represent proportionate growth consistent with the scale and character of the settlement.
HG4 – Affordable Housing Allocations

It is recognised that Policy HG4 does allocate development within some Minor Rural Settlements, but in the context of them being affordable housing led sites where there will be a requirement for the provision of a minimum 50% affordable housing to meet the affordable housing needs of the local community. Mr Fairweather has no objection in principle to this but does object to the fact that there is no development in St Nicholas (despite it being sustainably located on the A48).

Furthermore, The Spinney, St Nicholas (Site Ref: 460) proposes a 40% affordable housing provision which accords with Policy SP8 of the Deposit Plan. Should the Authority consider that the site is suitable for allocation under Policy HG4 then the provision can be amended to 50% to accord with the policy.

Candidate Site Response: The Spinney, St Nicholas (Site Ref: 460)
From a review of the Background Paper (BP18 a) - Candidate Site Assessment at Preferred Strategy Stage, we are aware that the candidate site The Spinney, St Nicholas (Site Ref: 460) has not progressed beyond Stage 2: Detailed Site Assessment: Site Characteristics and Physical Constraints.

The justification provided states that 'The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area'. Whilst this is disputed and it is considered that the site should have progressed, it is important to highlight that of all the Candidate Sites within St Nicholas, The Spinney has the least issues raised.

Other sites within the assessment raised concerns regarding Best and Most Versatile Land, intrusion into the open countryside and the loss of a sites identified as providing important views. Ultimately, Site Ref: 460, is clearly the most appropriate site for any development within St Nicholas and with limited constraints raised.
Turning to the reasons for not taking the site forward, the following is reiterated in the context of the impact on the character and setting of the Conservation Area.

Conservation Area Impact
St Nicholas is described in the Conservation Area Appraisal and Management Plan as 'a low density, linear village located on the A48' and the candidate site is located towards the west of the village and lies partially within the current

Conservation Area boundary. The Authority will be aware that the Conservation Area has been amended over the years to its current illogical designation regarding the Paddock area, similar to that of the Settlement Boundary.

The development of the Candidate Site is a clearly a logical and sensible infill development, which would have limited impact upon the Conservation Area. The majority of the site is already hidden from the A48 via mature vegetation and existing boundary features, and any proposed development would maintain this approach and minimise the visual appearance on the Conservation Area.
Listed buildings and other historic buildings of special interest are identified in the Conservation Area Appraisal as 'County Treasures'. These are situated at the heart of the Conservation Area. The buildings and their settings establish a scale and density for the historic area of the village to the south of St Nicholas' Church.

More modern development, away from the centre of the village at Ger-y-Llan to the northeast, Dyffryn Close to the southeast and Old Rectory Drive to the west are suburban in character with larger houses and generous gardens. These are all excluded from the Conservation Area and represent development at a lower density than the historic core of the village.

Whilst only a part of the Candidate Site is located within the Conservation Area, it has to be seen in the context of an appropriate infill site that links the southern part of the village with the more modern suburban type of development at Old Rectory Drive to the west. More significantly, the site provides an opportunity for a development to make a positive contribution to the character and appearance of the Conservation Area as well as respect or enhance the special architectural or historic interest.

This can be achieved by providing a new front boundary to the site and houses with gardens, of the type identified in the Conservation Area Appraisal and Management Plan that help define the character of the village. Whilst the Candidate Site extends to the A48, this is to allow the appropriate minimal access junction, whilst the majority of the generous grass verge will be retained, meaning that development will be clearly set back a considerable distance from the road and the opposite pavement.

Thus, the development will be totally screened when travelling along the A48 and is therefore not considered to affect the views to the north of the site. The development will complement and enhance the character of the rural and built environment surrounding the site.
In line with the objectives of the St Nicholas Conservation Appraisal and Management Plan, the boundary treatments proposed will be sympathetic and in keeping with the surrounding area, such that they do not detract from the historic assets and desired lines of view. Again, whilst detailed design has not yet been progressed, any boundary treatments proposed will avoid the use of stained close boarded timber fencing, over-elaborate modern metal railings and gates. It is reiterated that the building line for the front of the development will not encroach any further forward that the existing boundary and will be designed to be innkeeping and not detract from the existing character of the Conservation Area. Moreover, the layout of the site has been designed in such a way that the spaciousness and green infrastructure is retained and enhanced from a redundant Paddock.

Furthermore, the characteristics that give the Conservation Area its special interest, as identified in the Conservation Area Appraisal and Management Plan have been used as references for the design of the illustrative site layout.

The proposal is to use local materials and design details designed to preserve or enhance the special interest of the Conservation Area. Limestone laid as rubble external walling, slate roofs and roadside walls of varying sizes predominate. More modern houses in the area are rendered and painted white. This, according to the Conservation Area Appraisal gives 'some cohesiveness [to the area] despite their modern details'.

Elsewhere in the appraisal the village is described as having a 'rural character', a character that is reinforced by the existence of mature trees, singularly or in groups and simple pavements with narrow stone curves. The use of modern railings or timber fences are considered to be detrimental to the historic character of the conservation area.

Given the sites relationship with the Conservation Area, the proposal has been designed in to ensure that the development endeavours to protect, preserve and enhance the character of the area.

The site layout has been designed to avoid having the appearance of a suburban estate by providing a range of house types on plots that vary in size thereby maintaining the open structure of the conservation area as described.
Furthermore, the existing boundaries to the east and west, which are subject to TPOs, will be retained and enhanced and not detract from the character of the Conservation Area.

The site marks a transition point between the western end of the linear historic core of the village and the lower density development at Old Rectory Drive.
The landscape proposals have been designed to include sustainable drainage, and the tree planting reflects the isolated trees or groups of trees referred to in the Conservation Area Appraisal as significant areas of character.

The illustrative site layout represents an appropriate scale of development and an efficient use of land and as such the proposed development will not have any detrimental impact upon the Conservation Area.
Deposit Plan Amendments

Settlement Boundary

Given the above and the further assessment below, the strong preference would be for the site to be allocated for residential development within St Nicholas. This would form a logical amendment to the Settlement Boundary to include the western parcel (former Paddock) of Candidate Site - The Spinney, St Nicholas (Site Ref: 460). The current Settlement Boundary is illogical as the site is surrounded by development on 3 boundaries and the simple rounding off along the southern boundary would allow for an appropriate windfall infill development.
Conservation Area

Given the above then it is considered that the Conservation Area boundary would need to be amended to reflect the allocation of the site.
These amendments would be required to the Deposit Proposals Map.

Site Assessment
The site was promoted through the Candidate Site process and assessed at Preferred Strategy stage. However, it is not allocated within the Deposit Plan and thus was not subject to updated reassessment as part of this stage of plan preparation.

For completeness, and in order to clearly demonstrate the limited and proportionate nature of the site's constraints, the previous site assessment summary table is reproduced below. This is included to highlight that the site performs favourably in sustainability and deliverability terms, and that the matters previously cited as constraints are capable of mitigation through design.

A table comparing an updated site assessment prepared by Boyer against the Council's assessment has been provided.

This representation, submitted on behalf of Mr Fairweather in response to the current Vale of Glamorgan Council Replacement Local Development Plan (RLDP) 2021–2036 Deposit Plan Consultation, maintains that Land adjoining The Spinney, St Nicholas (Site Ref: 460) represents a logical, sustainable and deliverable parcel that should be allocated as a suitable and viable residential site within the RLDP.

Significant concern remains regarding the absence of residential allocations within Minor Rural Settlements, particularly St Nicholas, and the continued reliance on a limited flexibility allowance under Policy HG1. An increased flexibility margin of up to 15% would necessitate the identification of additional sustainable and deliverable sites. Such growth should be directed, in part, toward appropriate locations within Minor Rural Settlements to ensure a genuine range and choice of housing and to support rural community sustainability.

It is further noted that the site performs favourably in the Council's Candidate Site Assessment, with limited constraints identified. The matters previously raised, including Conservation Area considerations, are capable of sensitive mitigation through design and have been subject to detailed review. There is no substantive evidence demonstrating that the site is unsuitable for development.

Accordingly, the site is considered to represent a suitable, available and achievable allocation capable of contributing to the housing requirement, supporting affordable housing delivery, and reinforcing the spatial objectives of the Plan.
The Deposit Plan should therefore be amended to allocate Land adjoining The Spinney, St Nicholas (Site Ref: 460), or alternatively identify it as a reserve or flexibility site, in order to ensure the Plan is justified, effective and deliverable.

Change suggested by respondent:

It is strongly recommended that appropriate consideration is given to the widening of the Strategic Growth Areas to include St Nicholas as a sustainable settlement which is capable of accommodating a new allocation.

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/397

6844 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Taylor Wimpey [386]
Agent: Savills

Summary:

Taylor Wimpey consider that to date the growth strategy has placed disproportionate emphasis on identifying an alternative site within Barry, rather than giving due consideration to potential sites in nearby high-performing settlements such as Sully. Taylor Wimpey therefore strongly encourage the VoG to widen the search for additional allocations beyond the administrative boundary of Barry Town Council and to consider locations that represent a logical and sustainable extension to neighbouring primary settlements that are located within the Strategic Growth Area, including Sully.

The six key elements of the Sustainable Growth Strategy are noted and Taylor Wimpey support a spatial strategy that locates major new development for the delivery of sustainable housing growth in appropriate locations, such as Sully, that are supported by the relevant infrastructure, services and facilities. Providing new homes within Phase 3 aligns with the Strategic Growth Area identified within the RLDP Strategy which forms the primary focus for housing growth.

Policy SPG1 continues to identify Sully as a location where new housing development will be concentrated, therefore establishing a principle of development for Phase 3 and help to further align the provision of new housing with the existing facilities of Sully, reducing the need to travel. Sully represents an inherently sustainable location for future growth and aligns well with the Sustainable Transport Oriented Growth Option. As identified in the Deposit RLDP, Sully is classified as a Primary Settlement and performs a complementary role to Barry as a key centre. Its position within the Strategic Growth Area further indicates that an appropriate level of development at Sully would be acceptable, with both existing housing delivery and the current allocation at Swanbridge Road supporting its established role.

With existing development ongoing to the north of the Site, at Phases 1 and 2 of Land West of Swanbridge Road, Phase 3 is considered to provide an appropriate level of growth in a sustainable location that would form a logical extension to existing allocations. The sustainability and suitability of Sully to accommodate residential development is reinforced by the allocation of 500 dwellings under Policy MG2(37) ('Land West of Swanbridge Road, Sully') on land directly north of the site promoted by Taylor Wimpey. The progression of this location into a phase 3 development would continue to strengthen Sully's function as a primary settlement and would constitute a logical and coherent extension to the existing built form.

Taylor Wimpey appreciate the aspirations of the Council to deliver housing to meet the identified future housing needs of the VoG and wider growth aspirations of the South East Wales Region at a strategic level. Taylor Wimpey support the revised strategy moving away from North East Barry, however maintain the position that this level of growth should be re-allocated to those locations that are most suitable for growth, including sustainable settlements outside of Barry. Growth should not be focuses solely on Barry.

Full text:

1. Introduction

1.1.1 Savills is instructed by Taylor Wimpey PLC ('Taylor Wimpey') to respond to the consultation on the Deposit Plan as part of the preparation of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').

1.1.2 The submission is made in the context of Taylor Wimpey's position as the promoter of Site ID 376 (Land West of Swanbridge Road, Phase 3). The site is being promoted for a residential development comprising of 260 homes.

1.1.3 Taylor Wimpey is one of the UK's leading national housebuilders, with extensive experience in delivering high-quality residential developments across a wide range of local authority areas. The company has an established presence within the VoG area. Taylor Wimpey is in the process of delivering Phase 1 of the site with development of Phase 2 close to commencing to dovetail with the completion of Phase 1. Phase 3 would act as a logical extension to the site, effectively rounding off development in this part of Sully and dovetailing with Phase 2 which is anticipated to be completed in 2029.

1.1.4 The site was originally submitted as a candidate site as part of the Call for Candidate Sites stage in September 2022 by Taylor Wimpey. This was a comprehensive site submission demonstrating that the site was viable, deliverable and sustainable – the three tests for Candidate Sites to satisfy as set out in Paragraph 3.36 of the Development Plans Manual. The Candidate Site submission consisted of the following information:

• Archaeological Desk-based Assessment (prepared by RPS);
• Design Vision (prepared by Pegasus Group);
• Drainage Strategy & Flood Risk Assessment (prepared by Pheonix Design);
• Landscape Appraisal (prepared by Pegasus Group);
• Preliminary Ecological Appraisal (prepared by Soltys Brewster);
• High Level Viability Statement (prepared by Savills);
• Transport Technical Note (prepared by Vectos); and
• Supporting Statement (prepared by Savills).

1.1.5 Since then, and on behalf of Taylor Wimpey , Savills have also responded to the consultation on the Preferred Strategy in February 2024 as well as the Housing Growth in Barry consultation in July 2025 and the Housing Trajectory in October 2025.

1.1.6 This supporting statement is structured to initially comment on the approach taken by the VoG in assessing the

Land West of Swanbridge Road, Phase 3 site before commenting on specific policies that are contained within the Deposit RLDP.

1.1.7 In general, Taylor Wimpey's position is that, at present, the Deposit RLDP is not sound but that it could be made sound through the amendments as suggested throughout this Statement.

2. Candidate Site Assessment Process and Integrated Sustainability Assessment
Introduction

2.1.1 Candidate sites are in essence assessed through two means – the Candidate Site Assessment Background Papers and the Integrated Sustainability Appraisal.

2.1.2 Taylor Wimpey's position is that both of these documents do not provide an adequate assessment of the Land West of Swanbridge Road, Phase 3 site.

2.1.3 Each is considered in turn below.

Candidate Site Assessment Process

2.1.4 All candidate sites have been assessed at Preferred Strategy stage (reported as Background Paper 18) and Deposit stage (reported as Background Paper 18a).

2.1.5 The reason for the Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site not being carried forward as part of these assessments was presented in Background Paper 18 at the time of publication of the Preferred Strategy with Backgropund Paper 18a providing no further site analysis. The reason for the site not progressing this stage of the Candidate Site assessment process is as follows:

"Development of the site would lead to a loss of the Best and Most Versatile Grade 3a agricultural land contrary to national policy."

2.1.6 Whilst parts of the site do constitute Best and Most Versatile (BMV) land, Taylor Wimpey's position is that there are compelling reasons relating to the site's context and how it is utilised that mean a more nuanced position needs to be taken. Without such nuance, the RLDP risks not allocating a site that, whilst perhaps containing BMV, is otherwise suitable for development and more suitable for development then sites that the Deposit RLDP proposes to instead allocate.

2.1.7 Included at Appendix A, and included as part of Taylor Wimpey's representations on the Preferred Strategy and the Housing Growth in Barry consultations, is an Agricultural Assessment prepared by The Andersons Centre.

2.1.8 The key conclusions from this Assessment are that:

• The site is farmed by a tenant farmer whose main base is approximately 12km away which presents logistical and practical challenges. These challenges are exacerbated by the lack of farm buildings and the fact that there is no mains electricity;

• The site forms part of a wider 230 acre farm and so the cessation of agricultural practices on this parcel will not, by virtue of its size, prejudice the continued farming of the wider land parcel;

• The tenant farmer farms approximately 3,000 acres of land and so the loss of the ability to farm this parcel will have a negligible impact on the continuation of their agricultural operations;

• The site is bound on two sides by existing or permitted housing, on a third boundary by a railway line, and on its eastern boundary by a road; and

• Farming of the land does not support a high level of employment and if the land was lost for development, 0.15 of a full time labour unit's equivalent work would be lost.

2.1.9 Taking the above together, the conclusion needs to be reached that the site's size and context presents challenges for farming and that the development of Phase 2 by Taylor Wimpey has the potential to exacerbate these challenges. Aligned to this, the level of employment that the farming of the site supports is negligible and the cessation of farming of this particular parcel of land will not materially impact either the continued farming operations of the wider farm that the land sits apart of or the tenant farmer that farms the land.

Integrated Sustainability Appraisal

2.1.10 The Initial Integrated Sustainability Appraisal undertaken at Preferred Strategy stage provides a GIS based appraisal of all sites against 17 objectives. Inherently the Initial Integrated Sustainability Appraisal can be a bit of a blunt tool but Taylor Wimpey's position is that the site performs better against a substantial number of the 17 objectives than

the current assessment.

2.1.11 Included at Appendix B is an assessment undertaken by Taylor Wimpey which provides commentary against certain objectives and suggests why the site performs considerably better than forecast in the Initial Integrated Sustainability Appraisal.

2.1.12 A summary of this is presented below:
Table 1 Summary of ISA and Suggested Taylor Wimpey Approach

2.1.13 Taylor Wimpey's position here is clear – the inadequacy of the Integrated Sustainability Appraisal as a tool for assessing candidate sites can only be appropriate where the Integrated Sustainability Appraisal is done correctly and considers the mitigation measures that a candidate site submission proposed to put in place. Without this, the Integrated Sustainability Appraisal risks a situation – as Taylor Wimpey suggest has been the case in Policy HG1 KS1 – where a Key Site is selected in favour of alternative sites that are better performing.

3. Deposit Plan

3.1 Introduction

3.1.1 The following section of this Statement comments on the relevant Key Themes, Strategic Objectives and draft Policy Framework forming part of the Deposit Plan Consultation.

3.1.2 The Policy Framework has been reviewed with comments provided on only those policies considered to be of most relevance to Land West of Swanbridge Road (Phase 3), Sully. The position on individual policies contained within the Deposit RLDP are summarised in the table below:

Table 2 Taylor Wimpey Policy Position

Relevant Policy Support or Object
SP1 Sustainable Growth Strategy - Object
SP2 Settlement Hierarchy - Support
SP 6 Housing Requirement - Object
HG1 Housing Allocations: HG1 KS1 – Land at North West Barry - Object
TR1 Transport Proposals: TR1(2) Active Travel Route Sully to Cosmeston - Support
TR1 Transport Proposals: TR1(6) Highway Improvement Works Weycock Cross Roundabout - Object
CC1 Residential Operational Net Zero Carbon Development - Object
CI1 Open Space Provision - Clarity required
DNP5 Environmental Protection - Object as currently worded

3.2 Key Themes and Strategic Objectives

Homes For All

3.2.1 As noted in paragraphs 3.17 and 3.18 of the Deposit Plan the VoG has the highest affordability ratio in Wales with average house prices 9.7 times the average workplace earnings compared to the Welsh average, giving rise to a significant need for affordable homes which is under significant pressure. This highlights the ever increasing need for sufficient high quality housing, which Taylor Wimpey are committed to provide and supply the mix, type and tenure of housing needed within the local authority's growing population.

Placemaking

3.2.2 Taylor Wimpey embed strong placemaking standards across their developments as detailed within their Placemaking Charter. Taylor Wimpey consider Land West of Swanbridge Road (Phase 3) to present an opportunity to provide a comprehensive residential development that is accessible and well-connected with the existing settlement of Sully and compliments the earlier phases of development. As demonstrated in the earlier phases of development, the Site offers a sustainable location for future growth with easy access to a range of services and facilities in Sully.

Protecting and Enhancing the Natural Environment

3.2.3 Taylor Wimpey support the VoG's commitment to protect and enhance the natural environment through the integration of green/blue infrastructure network and the sustainable management of resources within the VoG. However where Objective 5 seeks to safeguard land from inappropriate development, proposals must be subject to the relevant planning balance giving weight to the surrounding land use and appropriateness of safeguarding agricultural land that would otherwise be unconstrained and considered suitable for development given the outstanding need for housing.

Promoting Active and Sustainable Travel Choices

3.2.4 Taylor Wimpey support the promotion of sustainable travel and active modes of transport, including the provision

of designated active travel routes that improve the connectivity between primary and key settlements, such as the Sully to Cosmeston active travel route.

3.2.5 As demonstrated in the earlier phases of Land West of Swanbridge Road, Taylor Wimpey support the promotion of active travel within new developments and provide opportunities for residents to easily engage with active travel.

3.3 Policy Framework

Policy SP1 Sustainable Growth Strategy

3.3.1 Taylor Wimpey's comments on this policy relate to the sustainable growth strategy in so much as it relates to the spatial strategy rather than the housing requirement that the RLDP adopts with further comments on the housing requirement provided in connection to Policy SP6 (Housing Requirement).

3.3.2 Taylor Wimpey appreciate the need to balance the ten strategic objectives against the need for growth and protection of the VoG's natural and built environment, and strongly support the strategic objective to provide homes for all. Taylor Wimpey maintain their position on the proposed growth strategy that has been established within earlier consultation responses submitted throughout the RLDP process, including the most recent consultation on 'Growth Options in Barry'.

3.3.3 Taylor Wimpey consider that to date the growth strategy has placed disproportionate emphasis on identifying an alternative site within Barry, rather than giving due consideration to potential sites in nearby high-performing settlements such as Sully. Taylor Wimpey therefore strongly encourage the VoG to widen the search for additional allocations beyond the administrative boundary of Barry Town Council and to consider locations that represent a logical and sustainable extension to neighbouring primary settlements that are located within the Strategic Growth Area, including Sully.

3.3.4 The six key elements of the Sustainable Growth Strategy are noted and Taylor Wimpey support a spatial strategy that locates major new development for the delivery of sustainable housing growth in appropriate locations, such as Sully, that are supported by the relevant infrastructure, services and facilities. Providing new homes within Phase 3 aligns with the Strategic Growth Area identified within the RLDP Strategy which forms the primary focus for housing growth.

3.3.5 Policy SPG1 continues to identify Sully as a location where new housing development will be concentrated, therefore establishing a principle of development for Phase 3 and help to further align the provision of new housing with the existing facilities of Sully, reducing the need to travel. Sully represents an inherently sustainable location for future growth and aligns well with the Sustainable Transport Oriented Growth Option. As identified in the Deposit RLDP, Sully is classified as a Primary Settlement and performs a complementary role to Barry as a key centre. Its position within the Strategic Growth Area further indicates that an appropriate level of development at Sully would be acceptable, with both existing housing delivery and the current allocation at Swanbridge Road supporting its established role.
3.3.6 With existing development ongoing to the north of the Site, at Phases 1 and 2 of Land West of Swanbridge Road, Phase 3 is considered to provide an appropriate level of growth in a sustainable location that would form a logical extension to existing allocations. The sustainability and suitability of Sully to accommodate residential development is reinforced by the allocation of 500 dwellings under Policy MG2(37) ('Land West of Swanbridge Road, Sully') on land directly north of the site promoted by Taylor Wimpey. The progression of this location into a phase 3 development would continue to strengthen Sully's function as a primary settlement and would constitute a logical and coherent extension to the existing built form.

Figure 1 Extract of Growth Strategy

3.3.7 Taylor Wimpey appreciate the aspirations of the Council to deliver housing to meet the identified future housing needs of the VoG and wider growth aspirations of the South East Wales Region at a strategic level. Taylor Wimpey support the revised strategy moving away from North East Barry, however maintain the position that this level of growth should be re-allocated to those locations that are most suitable for growth, including sustainable settlements outside of Barry. Growth should not be focuses solely on Barry.

Policy SP2 Settlement Hierarchy

3.3.8 Taylor Wimpey support the conclusions of the Settlement Appraisal Review Background Paper which identifies Sully as a Primary Settlement, reflecting its important role in providing a level of housing growth, in addition to key local services and facilities. Within this Background Paper, Sully is recognised for its vital role as a sustainable community, scoring highly across all key principles in demonstrating its sustainability by providing for the day-to-day needs of its residents. Taylor Wimpey concur with the supporting evidence which reinforces Sully's importance within the settlement hierarchy.

3.3.9 Whilst Draft Policy SP2 presents a 'broad distribution of development within the Strategic Growth Area..', serious concerns continue to be raised around the level of growth around Barry and the emphasis placed on it as the focus for future development. Taylor Wimpey do not dispute the identification of Barry as a Key Settlement, given its position as the largest town within the VoG, however believe Barry should not remain the sole focus for growth where there are

opportunities available around primary settlements located within the Strategic Growth Area.

3.3.10 Put another way, it seems perverse for the Deposit RLDP to direct no new growth to a Primary Settlement within the identified Strategic Growth Area.

Policy SP 6 Housing Requirement

3.3.11 The purpose of this policy is to set the housing requirement and then identify the components of supply that are anticipated to meet this housing requirement. A number of Background Papers (nos. BP7, BP8, BP8A, ad BP9A) underpin the approach that is taken. Taylor Wimpey have a number of comments to make on the approach taken in this policy.

Housing Requirement

3.3.12 The approach taken in the Deposit RLDP, as with the Preferred Strategy beforehand, is for the housing requirement to make use of a 10 year dwelling-led scenario, an approach that reflects past completions and looks to extrapolate this forward over the lifetime of the RLDP.

3.3.13 Taylor Wimpey provided detailed commentary on the proposed housing requirement in their comments on the Preferred Strategy but note that Welsh Government have subsequently provided their comments on the Preferred Strategy raising no objection with the housing requirement proposed to be taken.

3.3.14 Taylor Wimpey's position though remains – if a dwelling-led scenario is to be used to determine the housing requirement then it needs to have a far shorter scenario length then 10 years as the first three years of the 10 year period selected were when supply was suppressed as a result of the current LDP not having been adopted.

3.3.15 That said, there is a clear contextual change since the Preferred Strategy was adopted, this being the publication of the 2022-based household projections have been published. Table 5 of Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections provides a comparison of the 2022-based projections with the 2018-based projections and the Deposit RLDP's housing requirement. A simplified version of this table is shown overleaf:

Table 3 RLDP Housing Requirement
Scenario Housing Requirement
RLDP 7,587
2018-based projections 6,214
2022-based projections 9,623

3.3.16 This is important as Paragraph 4.2.6 of PWW states that:

'The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans.'

3.3.17 The proposed approach of continuing to use the 10 year dwelling-led scenario, as a methodology, clearly does not do this.

3.3.18 The approach of using the 2022-based household projections would comply with the aspirations of PPW. Taylor Wimpey's position is that the commentary provided in the Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections for not using 2022-based projections is wholly inadequate and that these projections should be used.

Flexibility Allowance

3.3.19 Paragraph 5.58 of Edition 3 the Development Plans Manual (March 2020) makes it clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes the RLDP should plan for. This is in the interest of ensuring that sufficient housing is delivered in the event of some allocated sites either not delivering in their entirety or delivering less homes than anticipated. Paragraph 5.59 of the Manual clarifies that the extent of the flexibility allowance should be informed by local issues with 10% as a starting point (i.e. as the minimum).

3.3.20 The Adopted Local Development Plan (ALDP) applies a 10% flexibility allowance on top of the housing requirement for 9,460 homes so that provision is made for 10,408 homes.

3.3.21 Paragraph 1.2.34 of the Annual Monitoring Report 2024-2025 provides a comparison of the number of homes that have been completed and the level of completions that the ALDP anticipates. This shows that 6,999 homes have been delivered up to 1st April 2025 against a cumulative dwelling target of 8,829 homes, representing a shortfall of 20.7%.

3.3.22 Taylor Wimpey's point here is that the ALDP's flexibility allowance of 10% is insufficient to ensure that the ALDP's housing requirement is actually being delivered. This is clear evidence that a higher flexibility allowance should be used

for the RLDP. Although for different reasons, but following a direction from the Welsh Government Planning Inspector, Bridgend County Borough Council has increased its flexibility allowance to 20% and, it is considered that such a buffer is appropriate for the VoG's RLDP.

Non-Delivery Allowance on Land Bank

3.3.23 Line C of Table 2 of the Preferred Strategy relates to those sites that either benefit from planning permission or are subject to a resolution to grant planning permission subject to planning permission. Combined, these sites are identified as having capacity for 1,860 homes.

3.3.24 The current approach, which assumes that all other sites which are under construction or sites where there is either a planning permission in place or sites where there is a resolution to grant planning permission subject to the signing of a Section 106 agreement will be completed in full, causes concern for Taylor Wimpey.

3.3.25 There are multiple reasons why homes that benefit from either planning permission or a resolution to grant planning may not be delivered. These relate to viability, but also to specific site constraints and landowner intentions.

3.3.26 A point that is separate, but inherently linked, to the above is that often the capacity of a site for which reserved matters approval is sought is less than that permitted at outline stage. Requirements for SAB approval and the demonstration of a biodiversity net benefit, for example, reduce the capacity of a site at detailed design stage but are often not factored in at outline stage, particularly where the outline application is not progressed by a housebuilder.

3.3.27 Research undertaken by the Local Government Association for England (no such data is available for Wales) suggests that, between 2010/2011 and 2019/2020 a total of 2,782,300 dwelling were granted planning permission whilst there were only 1,627,730 completions. This means that during this period just 58.5% of those homes which were granted planning permission were completed.

3.3.28 Taylor Wimpey is not suggesting that applying a discount of 41.5% is necessarily correct and the above is both from England and a few years out of date but the need for a discount that relates specifically to Line C is very clear.

3.3.29 It's difficult to know what this figure should be but Taylor Wimpey suggest that a 20% figure is used to reflect the flexibility allowance.

Windfall Allowances

3.3.30 The approach taken in the Deposit RLDP is to assume that 1,303 homes will be delivered across Windfall Sites. This has been calculated on the basis of previous completion delivered as windfalls.

3.3.31 Taylor Wimpey's concern is that the delivery of homes on Windfall Sites inherently becomes more challenging over time as the easier to develop sites have been delivered and the buildings and land that hasn't been developed is subject to increasing levels of policy protection. The approach taken by Cardiff Council in their Deposit RLDP is to assume that 75% of the 10 year average Windfall Sites will be delivered and such an approach seems entirely appropriate in this case.

3.3.32 An Urban Capacity Study (October 2023) prepared by the VoG, seeks to corroborate this by identifying 2,627 homes that could be delivered across the VoG. Whilst the windfall allowances would be less than the suggested urban capacity, this shouldn't be seen as problematic or as a conflict as the purpose of the Urban Capacity Study is, as the name suggests, just to identify sites which may have capacity. It doesn't account for land ownership (and whether the land owners have aspirations to dispose of the site) or development viability. In addition, the approach taken to site capacity to is to assume a density based on site type but it does this without an appreciation of site constraints and is based on the gross rather than net area.

Rolled Forward Sites

3.3.33 Taylor Wimpey have concerns with the approach that is taken in Table 2 of the Deposit RLDP which identifies allocations for 959 homes that are to be rolled over from the ALDP to the RLDP.

3.3.34 Concerns are raised around two sites in particular - Land to the west of Pencoedtre Lane, Barry and Land between new Northern Access Road and Eglwys Brewis Road, These sites are allocated in the ALDP but have failed to be delivered. Given the longstanding period during which there has been clear policy support for development but no completions, it follows that there are serious concerns around the deliverability of these two sites which, together, are allocated for 370 homes.

3.3.35 The failure to deliver these dwellings is due to a number of factors which are detailed in Taylor Wimpey's Preferred Strategy consultation response, which questions whether these sites will deliver at all or at a significantly reduced capacity due to the following reasons:

■ Viability constraints;

■ Site specific constraints;
■ Landowner intentions;
■ Requirements for SAB approval; and
■ Biodiversity net benefit;

3.3.36 Whilst it is recognised that there may be policy support for the delivery of these two sites, there deliverability is clearly uncertain and they should be removed from Table 2.

Conclusion

3.3.37 The following table summarises the approach previously proposed in the Deposit RLDP and compares it to the amendments suggested by Taylor Wimpey in the preceding sections of this Statement.

Table 4 Deposit RLDP Housing Supply and Taylor Wimpey's Suggested Approach
Housing Supply - Deposit Plan (December 2025) - Taylor Wimpey Suggested Approach (March 2026)
Housing Requirement - 7,890 - 9,623
Flexibility Allowance - 10% - 20%
Flexibility Allowance – 770 - 1,925
Housing Requirement + Flexibility Allowance - 8,660 - 11,548
A – Completions - 1,747 - 1,747
B – Units Under Construction - 313 - 313
C and D- Units with Planning Permission Minus Non-Delivery Allowance - 1,777 1,488
Existing Supply - 3,827 - 3,548
E – Large Windfall Sites - 720 - 540
F – Small Windfall Sites - 583 - 438
E+ F Total Windfall Allowance - 1,303 - 978
RLDP Allocations - 3,520 - 3,150

3.3.38 The conclusion reached in Taylor Wimpey's analysis is that, as a result of both the suggested housing requirement and flexibility allowance combined with Taylor Wimpey's comments on the components of supply, the Deposit RLDP needs to find allocations to deliver a further 3,872 homes.

Policy HG1 KS1 – Land at North West Barry
3.3.39 Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. Taylor Wimpey has provided comments on the housing requirement that is set in the RLDP and the components of supply that are anticipated to meet it in the proceeding sections of this Statement.

3.3.40 As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.

3.3.41 There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.

3.3.42 Policy HG1 KS1 proposes to allocate the site known as 'Land at North West Barry'.

3.3.43 The proposed allocation of this site follows a consultation – entitled 'Housing Growth in Barry' - undertaken by the VoG in July 2025 which proposed to allocate three sites in Barry as an alternative to the North East Barry site that was identified as a Key Site in the Preferred Strategy but was considered to no longer be deliverable.

3.3.44 Taylor Wimpey responded as part of the 'Housing Growth in Barry' consultation, supporting the removal of North East Barry as a Key Site but raising serious concerns with the proposed allocation of 'Land at North West Barry' as an alternative.
3.3.45 These concerns remain and Taylor Wimpey strongly consider there need to be other alternative sites – such as Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) - within nearby settlements that perform better than the Land at North West Barry site and should be allocated for housing.
3.3.46 To support this conclusion, Taylor Wimpey has undertaken a review of the Integrated Sustainability Appraisal (ISA) which provides a scoring of different candidate sites against the 17 objectives as well as considering and comparing the sustainability and accessibility of the two sites.

Integrated Sustainability Appraisal

3.3.47 The below table provides a comparison of how the Integrated Sustainability Appraisal scores Land West of

Swanbridge Road (Phase 3), Sully (Ref. 376) compared to the Land at North West Barry site. Two different comparisons are provided – one which compares the actual scoring in the ISA and a second which compares the two sites following Taylor Wimpey's suggested scoring which is included as Appendix A.

3.3.48 These tables clearly highlight where the subject site out performs North West Barry across numerous objectives.

Table 5 Comparison of Phase 3 Land West of Swanbridge Road (Site ID 376) and North West Barry (Site ID 490) ISA performance

3.3.49 From an initial review, the Integrated Sustainability Appraisal shows that Land West of Swanbridge significantly outperforms North West Barry in terms of the number of significantly positive scores '++' and the number of '—' scores. To this end the subject site provides clear advantages above and beyond North West Barry in terms of homes, health, and transport. As such Land West of Swanbridge is considered to have the capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge; The site is within 800m of a health service and an active travel route; and, The site is within close proximity (≤800m) to a railway station or bus stop, town/ retail centre and an active travel route. Taylor Wimpey consider this assessment should go further to recognise the associated benefits to the leisure than be provided by the site's development.

3.3.50 Following Taylor Wimpey's re-assessment of the site against the Integrated Sustainability Appraisal ISA objectives it is also considered to obtain notably more positive '+' scores than North West Barry. It is also worth noting that North West Barry has more unknown impacts than Land West of Swanbridge which introduces a level of uncertainty around its potential for further negative impacts. Moreover, North West Barry scores a significant number of negative impacts across the ISA, with the extension site obtaining double the amount than Land West of Swanbridge Road.

3.3.51 Taylor Wimpey's position is that it would be unsound to allocate a site that performs considerably poorer in the Integrated Sustainability Appraisal than a site that is not proposed to be allocated.

Accessibility and Sustainability

3.3.52 SLR Consulting have prepared an updated document demonstrating the Site's sustainability credentials and providing a detailed overview of existing and future active travel and public transport infrastructure. This is included as Appendix C.

3.3.53 As a starting point, it considers those services within Sully. In terms of local amenities, the population size of Sully, naturally benefits from a good range of local amenities and services, and therefore it is anticipated that a high proportion of future residents' day-to-day journeys would be contained within the village and undertaken via walking or cycling. The Walking Catchment Map prepared by SLR demonstrates this and illustrates services within walking distance from the Site.

3.3.54 The proposed development benefits from local existing and future / planned infrastructure which will help support travel by sustainable modes such as walking, cycling and public transport. The Site falls within the less than 15 minutes Public Transport Catchment for bus and rail services. The Site is supported by the existing bus network, connecting Sully with Barry, Penarth and Cardiff – the nearest bus stop approximately 400m from the centre of the site; Moreover the Site is within proximity to Cadoxton and Penarth railway stations which have regular services in each direction in addition to the existing walking and cycling infrastructure in and around Sully.

3.3.55 The future accessibility of the Site will be further enhanced through the ongoing and planned South Wales Metro improvements, future active travel routes and the proposed Sully to Penarth mixed use link. The below figure shows several newly proposed active travel routes running close to the site including a new walking / cycling route along Swanbridge Road. Planning applications are now being submitted to support the delivery of these new active travel links. In March 2025 a planning application was submitted proposing a new route between Palmerstown and Dinas Powys.

3.4 SLR have undertaken further assessment work comparing the sustainability credentials of Land West of Swanbridge Road to Land North West of Barry. Land North West of Barry, is separated from the existing built-up area by the B4266 Pontypridd Road where the eastern and southern boundaries abut residential properties. As such, the proposed access for all modes would be taken from the A4226 Port Road West. The A4226 and B4266 can be a barrier to the promotion of active travel in that they facilitate vehicular travel and do not provide an attractive environment for pedestrians.

3.5 Furthermore, Land North West of Barry is on the fringes of Barry and had few if any facilities within a 10 minute walk, other than bus stops. In comparison, Land West of Swanbridge Road in Sully benefits from its proximity to the High Street in Sully and the services there.

3.6 The below table demonstrates differences in accessibility to amenities between the two sites, where Land West of Swanbridge Road presents a more favourable location for future development.

Table 6 Comparison of Local Facilities Between Land North West of Barry (Site ID 449) and Land West of Swanbridge Road (Phase 3) (Site ID 376)

3.7 Whilst the walking distance shown from Land North West of Barry to the nearest bus stop is slightly less than the Swanbridge Road Site, it should be noted that the bus services that can be accessed from Sully are more frequent and more direct than those which can be accessed from Land North West of Barry.

Conclusion

3.8 Taking the above together, the conclusion Taylor Wimepy reach is that their Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site performs more strongly than the Land North West of Barry site.

Policy TR1 Transport Proposals

3.9 The draft transport proposals contained within the Deposit RLDP have been reviewed with the following proposals considered to be pertinent to the Site and draft residential allocations.

TR 1 (2) Active Travel Route: Sully to Cosmeston

3.10 Taylor Wimpey support the designation of an active travel route connection the eastern side of Sully with Cosmeston in the north-east. Most notably the proposed route will pass Swanbridge Road which provides direct access to Land West of Swanbridge Road Site, with Phase 3 in close proximity to the travel route. The proposal would further enhance the accessibility and sustainability of the Site as a logical extension for residential development in Sully.

Figure 4 Extract of Deposit RLDP Proposals Map with Land West of Swanbridge Road (Phase 3) Identified

TR1 (6) Highway Improvement works: Weycock Cross Roundabout, Barry

3.11 Taylor Wimpey raise concerns around the proposed works at the Wyecock Cross Roundabout, compared to the other improvement works proposed. As noted in the Deposit RLDP, this roundabout forms a key connection within the wider strategic highway network and therefore of high importance for the local area and surrounding communities. The proposed options presented within the Deposit RLDP provide little certainty of the scope of works required with no preferred option identified. This raises concerns around the impacts of the highway improvements on the deliverability of the adjacent draft allocation of North West Barry. The same concerns arise when considering the roundabout improvement works in combination with the proposed access strategy contained within North West Barry's supporting information package. The proposed road widening measures (c.11m increase) required to make the draft allocation accessible would have a significant impact on the wider transport network at this strategic junction.

Policy CC1 (Residential Operational Net Zero Carbon Development)

3.12 The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) then setting out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.

3.13 As a starting point, Taylor Wimpey share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) is not appropriate. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this results to an uneven framework for housebuilders, significantly adding cost and reducing certainty.

3.14 The justification for exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.

3.15 There are two points to be made here:

3.16 Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage. This Written Ministerial Statement was subject to a judicial review which was dismissed with the position taken in it found to be legally sound.

3.17 Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations.

3.18 Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking

into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound.

3.19 Secondly, Taylor Wimpey have concerns with the approach that has been taken with regards to viability.

3.20 From Taylor Wimpey's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.

3.21 As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated.

3.22 Taylor Wimpey's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. Savills' experience is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.

3.23 Taylor Wimpey's other concern with this approach is that the figure assumed as being required to achieve the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is driven from a Cost Assessment report published in January 2024. With the Background Paper 9A Housing Land Supply and Housing Trajectory not forecasting first completion onsite until 2028/2029, there is likely to be a period of approximately five years from the establishment of the figure for delivering the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) and when the first units would be delivered onsite.

3.24 Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy CI1 (Open Space Provision)

3.25 This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.

3.26 Taylor Wimpey note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.

3.27 Taylor Wimpey is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter, Policy DNP5 Environmental Protection

3.28 Taylor Wimpey consider the inclusion of 'the loss of the best and most versatile agricultural land' to be at odds with the other elements listed, where unlike the others mentioned, the loss of agricultural land would have limited, if any, impact on people, residential amenity and property.

3.29 It is acknowledged that the loss of BMV agricultural land may impact the VoG's overall amount of high quality agricultural land, however this should be assessed against the existing high level of BMV agricultural land within the County. The extent to which its loss is considered "unacceptable" should be subject to the planning balance against the overriding need for affordable housing and local housing need. Consideration towards the farming business case and economic viability are also required within the planning balance. In the case of Land West of Swanbridge Road, the loss of BMV agricultural land remains the only constraint that cannot be overcome, as noted in the Candidate Site Assessment. Whilst the loss of high quality agricultural land should be avoided, Taylor Wimpey consider that where the merits of the Site are overwhelmingly in favour for sustainable residential development in a suitable and logical location, Policy DNP5 should not stand in the way of housing delivery.

3.30 Whilst Taylor Wimpey support the clause within the draft policy: "Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the impact identified to an acceptable level. Planning conditions may be imposed, or legal obligation entered into, to secure any necessary mitigation and monitoring processes." However, in the context of BMV agricultural land, it is not clear how the mitigating measures, in the form of planning conditions or legal obligations, can be applied. This reinforces the earlier view that the inclusion of 'the loss of the best and most versatile agricultural land', as currently worded within the draft policy, is at odds with the other elements listed where mitigation strategies for pollution can be suitably conditioned.

Change suggested by respondent:

I advocate for a broader search beyond Barry and recognise Sully's role within the Strategic Growth Area. Growth should be allocated to the most suitable, sustainable locations, not solely within Barry.

Sound: Not specified

Attachments:

Redacted Deposit Representation Form - https://valeofglamorgan.oc2.uk/a/3c8
Redacted Candidate Site Rep Form - https://valeofglamorgan.oc2.uk/a/3c9
Redacted Candidate Site Rep Form 2 - https://valeofglamorgan.oc2.uk/a/3cv
Redacted ISA HRA Representation Form - https://valeofglamorgan.oc2.uk/a/3cb
Redacted Supporting Evidence - https://valeofglamorgan.oc2.uk/a/3g5

6858 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Mr Andrew Raymond [1170]
Agent: Boyer Planning

Summary:

The approach adopted within the RLDP places an overly narrow emphasis on growth within the Strategic Growth Area, primarily focused along rail corridors. This approach risks overlooking other sustainable rural settlements which also demonstrate appropriate connectivity and capacity to accommodate proportionate growth.

Settlements outside the Strategic Growth Area continue to perform an important role within the Vale's settlement hierarchy and rural economy. Villages such as Colwinston provide an established residential community and contribute to the vitality and sustainability of rural areas. Restricting opportunities for modest growth within such settlements risks undermining the long-term sustainability of rural communities.

The principle of directing development to sustainable settlements is supported. However, limiting development opportunities exclusively within the Strategic Growth Area is not considered to represent the most balanced or flexible spatial strategy.

Full text:

Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409)
Boyer have prepared the following representation on behalf of Andrew Raymond regarding their land interests associated with Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) in response to the current Vale of Glamorgan Replacement Local Development Plan (RLDP) 2021– 2036 consultation.

A summary of the main representations are as follows:
• Concern regarding the absence of proportionate residential growth opportunities within rural settlements such as Colwinston;
• Concern regarding the overall housing requirement and the need for an increased flexibility allowance within the housing trajectory;
• Questions regarding the spatial distribution of development and the limited range and choice of sites outside the Strategic Growth Area;
• Confirmation that Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) represents a logical and sustainable opportunity for modest residential development;
• Review of the Candidate Site Assessment process and the current status of the site within the Candidate Site Register; and
• The need to consider appropriate settlement boundary adjustments to facilitate proportionate growth in sustainable rural settlements.

SP1: Sustainable Growth Strategy
Whilst Policy SP1 outlines the housing delivery requirement (addressed under the response to SP6), the principal concern in relation to the site promotion is the concentration of the majority of future housing growth within the defined Strategic Growth Area.
It is understood and supported that new housing development should be located in sustainable locations with access to public transport and services. However, the approach adopted within the RLDP places an overly narrow emphasis on growth within the Strategic Growth Area, primarily focused along rail corridors. This approach risks overlooking other sustainable rural settlements which also demonstrate appropriate connectivity and capacity to accommodate proportionate growth.

Settlements outside the Strategic Growth Area continue to perform an important role within the Vale's settlement hierarchy and rural economy. Villages such as Colwinston provide an established residential community and contribute to the vitality and sustainability of rural areas. Restricting opportunities for modest growth within such settlements risks undermining the long-term sustainability of rural communities.

The principle of directing development to sustainable settlements is supported. However, limiting development opportunities exclusively within the Strategic Growth Area is not considered to represent the most balanced or flexible

spatial strategy. Greater flexibility should be introduced to allow appropriate small-scale allocations within sustainable rural settlements.

In this context, Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) represents a sustainable opportunity for a modest residential development that would align with the scale and character of the settlement. The site lies adjacent to existing built form and would represent a logical and contained extension to the village.
SP2: Settlement Hierarchy

Mr Raymond supports the identification of Colwinston as a Minor Rural Settlement and acknowledged its capacity to accommodate proportionate and sustainable growth, particularly given its accessibility and relationship with Bridgend to the west and Cowbridge, Barry and Cardiff to the east. The Deposit Plan retains Colwinston within the Minor Rural Settlement tier, however, does confirm that the settlement is outside the Strategic Growth Area.
Whilst the overarching principle of directing growth to the most sustainable settlements is supported, the Plan does not clearly demonstrate why settlements that are well connected and functionally related to larger centres, such as Colwinston, should be subject to such constrained growth.

In this context, Mr Raymond highlights Paragraph 3.10 which indicates that Minor Rural Settlements provide an 'important range of services and facilities that play a functional role in meeting some of the basic needs of residents within rural areas, reducing the need to travel'.
Building upon this, Policy SP2 does highlight that 'Minor Rural Settlements identified will be limited to the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments'.

Furthermore, the supporting text to Policy SP2 (Paragraph 6.17) confirms that 'those settlements that are considered to have sufficient population, services, and facilities to accommodate small scale growth without it having a detrimental impact on their existing character and local environment'.

This all building upon the identified importance of Minor Rual Settlements within the Preferred Strategy which outlined in Paragraph 6.50 that it is 'essential for the LDP to balance the growth in a way that supports the need of rural communities' and whilst it is evident that within these settlements 'general market housing will be limited to opportunities including infill' (Paragraph 6.51), the enabling of an element of 'open market housing will provide opportunities for the delivery of affordable housing reflecting the aspirations of rural communities to sustain their housing needs' (Paragraph 6.51). This importance of Minor Rural Settlements needs to be carried more strongly forward in the Deposit Plan.

Moreover, the evidence base does not sufficiently justify the degree of restriction now applied, nor does it explain why proportionate additional growth in appropriate Minor Rural Settlements would undermine the spatial strategy. As drafted, the policy risks limiting flexibility in the distribution of housing across the Vale. Accordingly, it is considered that the approach to Colwinston under Policy SP2 is not justified.

Clearly there continues to be a disconnect between the identified role and function of Colwinston, which is supported, and the actual ability to deliver the appropriate range and choice of dwellings in the rural settlements. For example, a modest allocation at Land adjacent to Waterton Lodge, Colwinston (Candidate Site 409) would represent proportionate growth that reflects the scale and character of the settlement. The site sits adjacent to existing development and would consolidate the existing settlement pattern without resulting in sprawl into the open countryside.

The current approach within Policy SP2 risks constraining flexibility within the spatial strategy and limiting opportunities to support sustainable rural communities.

SP6: Housing Requirement
Concerns are raised regarding the overall housing requirement and the level of flexibility incorporated within the Plan.

Policy SP6 currently establishes a housing requirement of 7,890 dwellings over the Plan period and includes a flexibility allowance of 10%, resulting in an overall provision of 8,660 dwellings.
The proposed supply is anticipated to be delivered through:
• 3,837 dwellings from the existing land supply
• 3,520 dwellings on allocated sites
• 1,303 dwellings from large and small windfall developments
Whilst the inclusion of a flexibility allowance is supported, it is considered that a 10% allowance may not be sufficient to ensure resilience within the housing trajectory.
Recent experience from other Local Development Plans across Wales has demonstrated the importance of incorporating higher flexibility allowances to account for delivery uncertainty, infrastructure constraints and potential delays to larger strategic sites.

For example, other authorities have incorporated flexibility allowances in excess of the standard 10% to ensure the robustness of their housing supply and to provide a greater degree of adaptability should circumstances change during the Plan period.

In this context, it is considered that the Vale of Glamorgan RLDP should incorporate a flexibility allowance of at least 15%. This would provide additional resilience within the housing trajectory and reduce reliance on a limited number of larger strategic allocations.
Smaller sites such as Candidate Site 409 at Waterton Lodge, Colwinston are particularly valuable in this context. Smaller sites are typically:
• More deliverable in the short term
• Less dependent on major infrastructure investment
• Capable of contributing to early housing delivery
• Able to increase overall build-out rates
Such sites can therefore play an important role in supporting the delivery of the Plan's housing requirement and enhancing flexibility within the supply.

HG1: Housing Allocations
Mr Raymond does not comment on any of the proposed housing allocations, however, does highlight that the delivery is incumbent upon a number of larger strategic sites, and that to allow a greater range and choice then smaller allocations in the Minor Rural Settlements are required. Only 122 units are proposed on smaller allocated sites, equating to approximately 2.6% of newly allocated supply under (E) Rural Affordable Housing Led Sites – policy HG4.

In the context of the above, there remains significant concern that the spatial strategy continues to exclude the required number of allocations within Minor Rural Settlements, including Colwinston.

The Plan recognises that Minor Rural Settlements provide an important range of services and facilities and play a functional role in meeting the needs of residents within rural areas. It further acknowledges that it is essential for the LDP to balance growth in a way that supports rural communities. Whilst general market housing is described as being limited to infill opportunities, the Plan also recognises that enabling an element of open market housing provides opportunities for the delivery of affordable housing and helps sustain rural communities.
It is agreed that the inclusion of smaller allocations can:
• Improve overall housing delivery rates
• Provide greater choice within the housing market
• Reduce delivery risk by diversifying supply
• Support rural communities through proportionate growth

Whilst it is noted that there is a proposed allocation within Colwinston – HG4 (1) – Land to the East of Colwinston for 25 units, Mr Raymond maintains that there is still a clear disconnect between the identified role and function of settlements such as Colwinston and the absence of any further allocated sites capable of delivering an appropriate range and choice of dwellings.

The strategy effectively restricts development to windfall and infill, without positively identifying opportunities that would logically consolidate and strengthen the settlement.
This approach is inconsistent with the settlement's accessibility and functional role. Colwinston is:
• Well connected to the A48 strategic highway network;
• Served by bus routes within close proximity to the site;
• Within commuting distance of Bridgend, Cowbridge, Barry and Cardiff;
• A sustainable and established residential community.
Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409) represents a contained and sustainable opportunity that naturally rounds off the existing settlement boundary. The site encloses the envelope of development without encroaching into open countryside or extending beyond the established line of built form. It is well related to existing services and infrastructure and is capable of accommodating a modest allocation consistent with the scale and character of the village.

A proportionate allocation at this location would align with the stated objectives of supporting rural communities, enabling a mix of market and affordable housing, and providing genuine choice within Minor Rural Settlements. The continued absence of such allocations undermines the internal consistency of the spatial strategy.

Furthermore, the strategy places substantial emphasis on rail-based corridors. Whilst development near rail infrastructure is supported in principle, sustainable growth should not be exclusively rail-led. Strategic highway connectivity and bus accessibility also represent legitimate and sustainable locational advantages.

The complete absence of allocations in Minor Rural Settlements creates an imbalance in distribution and limits housing choice. A modest allocation at Waterton Lodge would represent proportionate growth consistent with the scale and character of the settlement.

HG4 – Affordable Housing Allocations
It is recognised that Policy HG4 does allocate development within some Minor Rural Settlements, and in particular within Colwinston HG4 (1) – Land to the East of Colwinston for 25 units. In the context of Policy HG4 they will be affordable housing led sites where there will be a requirement for the provision of a minimum 50% affordable housing. This is to meet the affordable housing needs of the local community. Mr Raymond has no objection in principle to this but does object to the fact that there is no other development opportunities recognised in Colwinston (despite it being sustainably

located on the A48).

Furthermore, Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409) could be reduced in size and could be amended to offer 50% affordable housing to accord with the policy (or even 100% affordable if the Authority sought this).

A balanced approach which allows both affordable housing led schemes and modest mixed-tenure developments would provide greater flexibility and assist in delivering a broader range of housing needs.

A modest development at Land adjacent to Waterton Lodge, Colwinston (Candidate Site 409) could provide an opportunity to deliver both market and affordable housing in accordance with Policy SP8. This would support local housing needs whilst maintaining the scale and character of the settlement.

Candidate Site Response: Land adjacent to Waterton Lodge, Colwinston (Candidate Site 409)
Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) was submitted to the Vale of Glamorgan Council during the 2022 Call for Candidate Sites as part of the preparation of the Replacement Local Development Plan (RLDP) 2021–2036.

The site is currently included within the Candidate Site Register, which represents a list of sites submitted for consideration through the plan-making process. Inclusion within the register does not in itself indicate that a site will be allocated for development, as all sites are subject to a structured assessment process.

These stages consider a range of factors including sustainability, accessibility, environmental constraints and deliverability.

As part of the ongoing plan preparation process, the Council produced an updated Candidate Site Register following the initial submissions. Sites continue to be evaluated as part of the evidence base supporting the RLDP.

In this context, Land adjacent to Waterton Lodge, Colwinston represents a sustainable and deliverable opportunity for modest residential development which could contribute positively towards the Plan's housing supply.

The site is located adjacent to the existing settlement and is well related to the current built form. Development in this location would represent a logical and contained extension to the village, rather than an isolated incursion into open countryside.

Furthermore, the site has been promoted through the formal candidate site process and should therefore be considered fully within the Council's site assessment framework.

Deposit Plan Considerations
Settlement Boundary

Given the location of Candidate Site 409 adjacent to the existing settlement of Colwinston, consideration should be given to whether a modest adjustment to the settlement boundary would enable the site to be appropriately integrated within the settlement.

A logical rounding-off of the existing settlement edge would allow development to occur in a manner that respects the existing built form and maintains a clear and defensible settlement boundary.

Such an approach would represent a proportionate response to the need for modest housing growth within rural settlements.

Site Assessment
The site was formally submitted through the Candidate Site process and is currently listed within the Council's Candidate Site Register.

Given the role that smaller deliverable sites can play in supporting housing delivery, it is important that sites such as Land adjacent to Waterton Lodge, Colwinston are fully considered as part of the ongoing assessment process. Smaller sites can provide valuable flexibility within the housing trajectory and contribute to early housing delivery within the Plan period.

Turning to the main reasons the site was not taken forward Mr Raymond provides the following response:
(a) Alleged intrusion into the open countryside
The Stage 2 Register cites "unacceptable intrusion into the open countryside". Mr Raymond submits that this conclusion fails to reflect the site's physical containment and relationship to the built form.
• The site directly adjoins existing dwellings at Waterton Lodge and mature boundary hedgerows; development here would constitute rounding-off rather than isolated sprawl.
• A strong landscape framework already exists, and additional planting could reinforce defensible boundaries.
Accordingly, the site's development would not materially extend the settlement into open countryside or harm landscape character, consistent with PPW paragraph 3.60.

(b) Highways and accessibility constraints
The Council refers to “major highways constraints” but no evidence highway assessment has been published by the Authority. Mr Raymond’s preliminary review confirms that safe vehicular access can be achieved from the adjoining local highway with modest engineering works and that the scale envisaged would generate limited traffic, well within local-road capacity.
Future submission of a Transport Statement can demonstrate compliance with PPW (Section 5: Active and Socially Just Places) and LDP Policy MD2 (criteria 6 and 8).
The site lies within walking distance of Colwinston’s core facilities (village hall, public house, bus stops), enabling sustainable travel choices for residents.
(c) Scale of development
Development at a scale that represents proportionate growth for Colwinston can be provided and would be entirely consistent with the “limited expansion” envisaged for minor rural settlements under PPW and the RLDP.
This level of growth would strengthen local demographics, support the rural housing supply and modestly contribute to the Vale’s overall housing requirement, without exceeding infrastructure capacity.
(d) Ecology, landscape and agricultural land classification
The land is semi-improved grassland with no statutory designations. Preliminary review indicates no SINC coverage or protected species constraints. Detailed ecological and agricultural-land surveys can be provided to confirm that any residual impacts are minor and capable of full mitigation.

Development can achieve net biodiversity gain through buffer planting, sustainable drainage and native-hedgerow reinforcement, fully consistent with PPW and RLDP environmental objectives.

5. Sustainability and deliverability
• Availability: Mr Raymond, as landowner/promoter, confirms the site is immediately available for development.
• Deliverability: The site is modest, unconstrained by flood risk or abnormal infrastructure requirements, and can deliver homes within the early part of the plan period.
The proposal supports rural-settlement vitality, contributes to local housing choice, and allows design to embody placemaking principles (PPW Ed. 12 Section 2).

Conclusion
This representation, submitted on behalf of Mr Raymond in response to the current Vale of Glamorgan Council Replacement Local Development Plan (RLDP) 2021–2036 Deposit Plan Consultation, maintains that Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409) represents a logical, sustainable and deliverable parcel that should be allocated as a suitable and viable residential site within the RLDP.

Accordingly, the site is considered to represent a suitable, available and achievable allocation capable of contributing to the housing requirement, supporting affordable housing delivery, and reinforcing the spatial objectives of the Plan.

Change suggested by respondent:
Greater flexibility should be introduced to allow appropriate small-scale allocations within sustainable rural settlements.

Sound: Not specified

Attachments:
Email representation redacted - https://valeofglamorgan.oc2.uk/a/3vf

6893 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Catesby Estates [3713]
Agent: Turley

Summary:
Policy SP1 - Sustainable Growth Strategy reiterates that the Plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that, outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.

In order to ensure that the minimum target figure is met, it is important that the Plan identifies a sufficient number of sites / housing allocations to meet both the short and longer term development needs. As previously stated, Catesby SUPPORTS the overall growth strategy across the Vale of Glamorgan contained in the Deposit RLDP. However, it is questioned whether or not there is sufficient land allocated to deliver the growth required.

Of the overall housing target of 7,890 dwellings, approximately half of these are to be delivered via rolled forward allocations and extant consents. Whilst some such sites can be expected to come forward, Catesby would caution against the over-reliance on delivery of historically allocated sites.

Catesby suggests that VoGC considers the inclusion of additional sites to deliver the predicted growth strategy identified in the RLDP. This will strengthen the land supply position ensuring a robust RLDP can be adopted which has the ability to ensure the delivery of the necessary growth. Catesby supports growth along the ‘Connectivity’ corridor, particularly in Minor Rural Settlements such as Llandow to assist with this.

Full text:

VALE OF GLAMORGAN DEPOSIT REPLACEMENT LOCAL DEVELOPMENT PLAN - REPRESENTATION ON BEHALF OF CATESBY ESTATES

This response to the consultation on the Vale of Glamorgan Council ('VoGC') Deposit Replacement Local Development Plan ('RLDP') is submitted by Turley on behalf of Catesby Estates ('Catesby'). It sets out Catesby's comments on the Vale of Glamorgan Deposit Replacement LDP published for consultation on 28th January 2026.

Catesby control a significant amount of land at, and surrounding Llandow Airfield, and sought promotion (previously promoted by L&Q Estates prior to its acquisition by Catesby) of the site during the call for Candidate Sites (Site ID Ref: 448). The Stage 2 Candidate Site Register confirms that the site was not considered suitable for further consideration by VoGC. This was primarily due to its location outside of existing settlement boundaries and the scale of dwellings/services proposed. It was concluded that the scale of development proposed could be considered a new settlement, which should only be proposed as part of a joint LDP, an SDP or Future Wales.

Catesby acknowledges that promotion of a site of this scale falls outside the scope of the RDLP. The site will be promoted through the emerging South East Wales Strategic Development Plan in due course. Catesby maintains that the site is capable of accommodating major development and that its promotion for strategic scale regeneration is entirely appropriate given its sustainable credentials and the contribution that it can make to the Vale of Glamorgan and wider Cardiff Capital Region. Catesby remains keen to working collaboratively with VoGC to bring forward development at Llandow in the medium to long term and looks forward to continuing the largely positive discussions that have taken place to date.

VISION AND STRATEGIC OBJECTIVES

The vision for the Deposit RLDP maintains that, by 2036, VoGC will provide housing growth which responds to the authority's growing population and caters for all. This should be shaped through successful placemaking, delivering diverse communities and ensuring that the Vale is a healthy and inclusive place for everyone.

VoGC identifies key themes and strategic objectives to deliver the vision of the Deposit RLDP. This includes "ensuring that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population", to address the accommodation needs of all the Vale's communities (Objective 3 - Homes for All). Objective 4 – Placemaking also seeks for new development to be appropriately located, contribute towards creating active, safe and accessible places, and protect and enhance the character of existing communities.

The provision of a mix of new homes is also crucial in fostering diverse, vibrant and connected communities in line with Objective 7. Consequently, physical, economic and social regeneration are facilitated, reflecting the needs and aspirations of local communities. Vital and vibrant rural communities are also provided through the delivery of growth in sustainable locations and supporting infrastructure.

Catesby broadly SUPPORTS the vision and strategic objectives of the Deposit RLDP to deliver a mix of high-quality new housing which responds to the authority's growing population, caters for all, and has placemaking at its heart. This new housing should be facilitated across the Vale in a variety of sustainable locations to best serve as many communities as possible.

SUSTAINABLE GROWTH STRATEGY

A key part of the Sustainable Growth Strategy for the Deposit RLDP is to deliver a sustainable level of housing growth which accords with the Vale's position within the Cardiff Capital Region (CCR). Specifically, the Deposit RLDP makes provision for a housing requirement of 7,980 dwellings over the Plan period (526 dwellings per annum). The Deposit RLDP makes clear that this is both deliverable and ambitious, reflecting the Vale's position in the Future Wales national growth area. Crucially, the housing requirement will be achieved through a range of housing opportunities, to encourage existing residents to live and work in the Vale and encourage inward migration of new residents, at a level commensurate with the CCR.

However, Catesby would suggest that this level of growth is still too low, taking into account the aspirations of Future Wales for the area and the latest population and household projections, which suggest a higher level of need is required for the Vale.
The Sustainable Growth Strategy also seeks for new and existing housing, employment, services and facilities to be co-located to reduce the need to travel. New housing development shall be specifically located in places that are already well served by existing and/or proposed services, facilities and employment opportunities. This includes, where appropriate, those offered by the business parks and industrial estates already established in the Vale. The Strategy also allows for regeneration opportunities on previously developed and under-utilised land.

The Key Diagram (Figure 1) identifies the proposed Strategic Growth Area (SGA), connectivity routes, key locations for future development, the Plan's hierarchy of settlements and interrelationships with adjoining local authorities.

Figure 1: Key Diagram

Catesby considers that the Minor Rural Settlements dispersed within the 'Connectivity' corridor, such as Llandow, should play a supporting role in accommodating housing growth, given their important range of services and facilities that reduce the need to travel. The Sustainable Growth Strategy also allows for small scale affordable housing led developments in Minor Rural Settlements, where appropriate.

Noting Llandow's accessible location and proximity to existing and emerging strategic employment opportunities, Catesby broadly SUPPORTS the Sustainable Growth Strategy insofar as seeking to achieve the housing requirement through a range of housing opportunities. This includes the co-locating of housing and employment growth, with a focus on established business parks and industrial estates.

Paragraph 5.14 notes that "where appropriate, the broad principle is that the spatial strategy should look to ensure that new housing is in places where employment opportunities already exist or are proposed." Catesby supports this principle, noting that the Llandow Airfield site offers the potential to deliver co-located residential and employment opportunities at scale, as identified within the promotion document submitted in support of its response to the call for Candidate Sites. This will remain a key aspiration of the site's future promotion via the emerging SDP.

However, Catesby reiterates that the housing requirement for the Vale should be higher, accounting for the aspirations of Future Wales for the area and the latest population and household projections. A more ambitious Growth Strategy is needed to accommodate this increased housing requirement.

POLICY FRAMEWORK

Policy SP1 - Sustainable Growth Strategy reiterates that the Plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that, outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.

In order to ensure that the minimum target figure is met, it is important that the Plan identifies a sufficient number of sites / housing allocations to meet both the short and longer term development needs. As previously stated, Catesby SUPPORTS the overall growth strategy across the Vale of Glamorgan contained in the Deposit RLDP. However, it is questioned whether or not there is sufficient land allocated to deliver the growth required.

Of the overall housing target of 7,890 dwellings, approximately half of these are to be delivered via rolled forward allocations and extant consents. Whilst some such sites can be expected to come forward, Catesby would caution against the over-reliance on delivery of historically allocated sites.

Catesby suggests that VoGC considers the inclusion of additional sites to deliver the predicted growth strategy identified in the RLDP. This will strengthen the land supply position ensuring a robust RLDP can be adopted which has the ability to ensure the delivery of the necessary growth. Catesby supports growth along the 'Connectivity' corridor, particularly in Minor Rural Settlements such as Llandow to assist with this.

Policy SP2 – Settlement Hierarchy broadly distributes development in line with the hierarchy of settlements, reflecting the role and function of places and directing growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision. Llandow is identified as a Minor Rural Settlement, new development associated with which should be mainly limited to infill opportunities and small-scale affordable housing led schemes (sites of up to 25 dwellings with a minimum of 50% affordable provision).

Catesby would suggest that specific sites in and around all settlement types may be suitable for a greater level of development than that suggested by the settlement hierarchy, and these should be explored accordingly. As part of this, Catesby SUPPORTS the recognition in the Policy Framework that the existing services and facilities in and around the Minor Rural Settlements should be safeguarded, supported and enhanced, and that in order to do this, growth should still be balanced in a way which supports these rural communities (Paras 6.16 and 6.17).

Policy SP3 – Development in the Countryside is clear that development will only be permitted in the countryside where it falls within one of the specified uses. This only includes Affordable Housing Exception Sites in respect of housing development. Catesby suggests that further development sites are required across the Vale in order to meet the Council's housing requirement, which should consider locations within the countryside where appropriate.

Catesby reiterates that the co-location of housing with existing infrastructure and facilities will be crucial to achieving the overall Growth Strategy of the RLDP. Development in and adjacent to Minor Rural Settlements is also key to this, especially those located in proximity to the 'Connectivity' corridor on the Key Diagram.

Catesby SUPPORTS development within these locations, particularly at Llandow. This is key in order for the Vale of Glamorgan to achieve part of its overarching vision, which states that "growth within rural settlements has provided for the needs of residents and supports balanced multi-generational communities that contribute to the vibrancy of the rural area".

SUMMARY

We trust that the above representations can be considered duly made and look forward to receiving confirmation accordingly. Catesby welcomes the opportunity to comment further as the RLDP progresses through to adoption. Catesby looks forward to engaging with the Council over the months ahead to continue a dialogue regarding the future delivery of development at Llandow. If you require any further information, please do not hesitate to contact me on the details below.

Change suggested by respondent:

Catesby suggests that VoGC considers the inclusion of additional sites to deliver the predicted growth strategy identified in the RLDP. This will strengthen the land supply position ensuring a robust RLDP can be adopted which has the ability to ensure the delivery of the necessary growth.

Sound: Not specified

Attachments:

Redacted Representation Form - https://valeofglamorgan.oc2.uk/a/3cc
Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/4sn

6939 Comment

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Penarth Town Council (Mr Pete Newton, Principal Policy, Innovation and Development Officer) [1125]

Summary:

Members noted that there was not much focus on Penarth or identified potential future development for Penarth beyond that already underway at the location near to Cosmeston but welcomed flexibility in its approach. Members expected to be more closely involved in the decisions and planning of this, and other such developments, and provide opportunity for wider consultation where appropriate, such as pre-application consultations, as well as would expect to be included in consultations concerning sites adjacent to Llandough, Dinas Powys, and Sully given their impact upon the town.

Penarth as a town is currently developed to its boundaries, save for the development at Cosmeston. It is, therefore, more dependent than other Service Centres on windfalls of land or buildings which may arise during the currency of the Plan. In 2023, an extensive assessment of the potential of the town concluded the following:

“There is marginally less capacity in Penarth [and Llandough] than the projected figures. However, this does not mean that the projections are incorrect or unjustifiable. The reported figures have not included a significant amount of capacity on open space land, and the projected figures for conversion of existing buildings and intensifications will be surpassed if the extant consents that exist this early in the Plan period are implemented.”

The degree of flexibility, however, is substantially depending on one large site. P009, Headland School, is identified as both a potentially disused building and as a site with a capacity of 111-120 units. This special school is full to capacity and used by many Council in both Wales and England.

Full text:

Penarth Town Council Deposit RLDP Consultation Response

Comments collated at a meeting of the Council’s Consultation Task and Finish Group on 9th February 2026

Some Members attended the RLDP consultation drop-in session in Penarth and in general found it to be very informative.

Members support the general development strategy but did note the lack of information concerning discussions with adjacent and other nearby Principal Councils in the CJC Region. In view of the forthcoming Strategic Development Plan, encompassing the ten authorities, members felt that some further commentary regarding this is warranted.1

It is clear that the approach taken in the Cardiff paper is still that ideally, each Council is self-contained and “consumes its own smoke,” which does not show any wider strategic thinking between the ten authorities in preparation for a regional Strategic Development Plan.

Members agreed with the view that infrastructure to support new housing developments was required in order to create successful developments, although they acknowledged that logistically it was difficult to pre-empt demand for some services such as travel and health services. Members also noted that predicting developmental needs and opportunities within wider context surrounding the UK’s economic, political, and social landscapes.

Members noted that there was not much focus on Penarth or identified potential future development for Penarth beyond that already underway at the location near to Cosmeston but welcomed flexibility in its approach. Members expected to be more closely involved in the decisions and planning of this, and other such developments, and provide opportunity for wider consultation where appropriate, such as pre-application consultations, as well as would expect to be included in

consultations concerning sites adjacent to Llandough, Dinas Powys, and Sully given their impact upon the town.

Penarth as a town is currently developed to its boundaries, save for the development at Cosmeston. It is, therefore, more dependent than other Service Centres on windfalls of land or buildings which may arise during the currency of the Plan. In 2023, an extensive assessment of the potential of the town concluded the following:

"There is marginally less capacity in Penarth [and Llandough] than the projected figures. However, this does not mean that the projections are incorrect or unjustifiable. The reported figures have not included a significant amount of capacity on open space land, and the projected figures for conversion of existing buildings and intensifications will be surpassed if the extant consents that exist this early in the Plan period are implemented."

The degree of flexibility, however, is substantially depending on one large site. P009, Headland School, is identified as both a potentially disused building and as a site with a capacity of 111-120 units. This special school is full to capacity and used by many Council in both Wales and England.

Members did note the inclusion of Cogan Transport Interchange under section 6.196 but would have liked to see more information about its future developments as they see it as key to increasing public transport use to Barry and further to West Wales in general.

Members wished to advise that issues with both the bridge and the platforms at Cogan have been long term, with accessibility being central to these issues. Members felt that improvements to accessibility should be a priority at this site, with planting and landscaping considered secondary to this.

Members felt it was key to consider the additional stress on Penarth from increased anticipated demand of public transport needs and emphasised the need for this to be aptly considered by bus route providers as part of development work.

Members wanted to see a strategy that actively protects the town's heritage and culture whilst still being able to provide for current and future generations.

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16 and section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report2, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Under CC2, it was noted that the presumption against demolition3 in favour of retrofit and reuse may constrain maximum transition to net zero as, whilst there is grant aid available for public buildings and social housing, the retrofit monies available for private stock is limited.

Additional considerations will also need to be made as part of the Third Carbon Budget (2026-2030), Local Area Energy Plans and the climate change ISA theme.

Members also felt similar about the inclusion and consideration of sustainable development through the specific strategy outlined in section 5 of the document and felt this linked in well with ongoing Placemaking work and its strategic approach as detailed in SP4.

Members were pleased to see mention of the diversification of high streets, although noted that Penarth was above average in terms of occupancy. They hoped that the RLDP would be able to support the town centre and support other ways it could be improved, such as a fishmonger or identifying a site for a new Cemetery.

With Penarth classified as a Service Centre, they are identified as having a defined role. However, the decline of in-person retailing means that defining role is not that evident, and Members felt there is potentially a need to move away from the traditional retail role of Town Centres in favour of "repurposing, creating multifunctional, commercial, and service centres that meet the needs of the communities they serve" in line with Future Wales Town Centre First Policy. The term 'repurposing' suggests a stronger role for the public sector in enabling these new purposes, and Members felt that Placemaking Plans could be one potential framework for this.

Members felt that potential functional support that could be provided could include:
• The appointment of a Town Centre Manager
• Using supporting interventions such as an extension or reshaping of normal services such as Neighbourhood Services.
• Using existing or emerging new powers, such as compulsory purchases.

Members wished for the RLDP to facilitate the safeguarding of essential public services, including health, policing, fire and rescue in the town, which would help to develop the defining role of a Service Centre, and felt that specific reference to these would be beneficial.

Members supported the avoidance of coalescence with adjacent settlements through the reconfirmation of Green Wedges as it allows for relevant extensions to those settlements whilst allowing them to retain their identity.

Members noted that the Quiet Area provision under DNP6 only applies to Penarth and wished to know why this was the case.

Members advised that they welcomed further opportunity for consultation, particularly in relation to developments in the neighbouring Cardiff Bay area whilst acknowledging that this is not necessarily an RLDP concern.

Footnotes

1 There is an evidence paper concerning relations with Cardiff and a Statement of Common Ground with Bridgend. However, there is only a reference in the RLDP text to discussions with other regional Councils and not the paper itself. We would be grateful if you could provide the paper as it does impact on the soundness of this Plan.

2The UK Climate Change Committee's 'Progress Report: Reducing Emissions in Wales' highlighted the following aspects of import: Skills, Vehicle Charging Networks, Improving Recycling, Energy Plans, Decarbonising Public Buildings and Social Housing, and reducing Road transport Demand (Car-Kilometres).

3The UK Environmental Audit Committee (2022) noted that "the evidence we received consistently recommended that retrofit and reuse be prioritised over new build."

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3d5

7036 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Marion morgan [2413]

Agent: Geraint John Planning Ltd

Summary:

We object to the spatial growth strategy set out within the Deposit Plan and therefore question the delivery and soundness of the Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain an over-reliance of housing growth on this defined area, and the associated absence of growth in other Rural parts of the plan area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan, which includes enabling opportunities to provide employment and business premises within/near to rural settlements. The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the principal settlement and Strategic Growth Area of Talbot Green/Pontyclun/Llantrisant to the north. The current strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural and bus services should be appropriately assessed and focused on in terms of promoting sustainable development. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to deliver housing in the short and medium term of the Plan period.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the

Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ystradowen area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:
VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Ystradowen. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within

the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months
• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject

to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

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

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is

very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:
Table 6: Existing LDP allocations to be carried forward

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.
Extract of Housing Trajectory (annotated by GJP - red dotted line)

It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.
Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.
HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.
Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.
It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land at Ystradowen (Site ID: 430 / 4060) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) and Annex 2 for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 230 affordable homes in the Cowbridge housing market area / ward - which Ystradowen is located within. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation – see Annex 2.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ystradowen and the proposed site. As outlined within these representations, it is considered that the site (ID 430) represents a sustainable, deliverable and acceptable site. The site is located within 2.7 miles Cowbridge and 2.8 miles of Pontyclun. Due to the availability of frequent bus services, and active travel links, key services are readily available to access for any residents within Ystradowen without the need to travel by car. The site is within a maximum 9- and 14-minute bus journey (respectively) of the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and

• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Accordingly, the settlement of Ystradowen represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ystradowen, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.
As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 "For the purposes of this policy, 'small-scale' will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."
The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.
SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

Deliverability of the Site

In summary, the site seeks to deliver the following key elements:

• Provision of circa 67 new-build residential dwellings (including 50% affordable housing provision);
• A mix of house-types and tenures across the site to cater for a variety of needs;
• Creation of a new primary access into the site;
• Connection to pedestrian links within the wider area;
• Public open space; and
• Green Infrastructure; and
SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to

be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

Land at Ystradowen (Site ID: 4060)

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site. The 'Candidate Sites Assessment Deposit Plan Stage v2' for 'Land at Ystradowen (Site ID: 4060)' sets out that the position of the site at the Deposit Stage is as follows:

"Amendment of proposed use from housing to affordable housing led. Previous site reference 430. The original assessment concluded that whilst the site was adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.
The LDP site in question has subsequently been granted planning permission for housing. This site will serve the future needs of residents in the area and it is not considered that additional land should be allocated in this location."

In terms of the first paragraph, the assessment/conclusion implies and suggests that 'Land at Ystradowen' (4060)' does not adjoin the existing LDP settlement boundary as the allocated site ('Land off Sandy Lane, Ystradowen') has not been built out – "by virtue of an existing adopted plan LDP allocation this is currently under review". Detailed representations have been made and submitted previously at the Housing Trajectory (see Appendix B& C) that outlines that this is fundamentally incorrect. This is not repeated in full here, with just the main points re-iterated.

First and foremost, 'Land at Ystradowen (4060)' directly adjoins the existing LDP settlement boundary. Secondly, there has been a significant change in the position and circumstances. The allocated site ('Land off Sandy Lane, Ystradowen') is currently being "built out", with work commencing on site (see photographic evidence in Appendix C)
- post the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024). Accordingly, the site no longer adjoins "the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review". Given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.

With regards to the second paragraph, the assessment/conclusion outlines that "The LDP site … will serve the future needs of residents in the area and it is not considered that additional land should be allocated in this location". The arguments and case presented in Appendix B & C. There is a clear overreliance on 'rolled forward' sites / existing allocated sites. A total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%). We believe that a greater level of growth is achievable and should be considered. Not least as there is an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings). As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy. Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply. The "future needs of residents in the area" will therefore not be met/served by just this site, and it is considered that additional land should be allocated in this location.

Furthermore, to reinforce, illustrate, and evidence the point in specific reference to the site the subject to this

representation (located in Ystradowen), reference is made to application ref. 2013/00856/OUT – 'Land off Badgers Brook Rise, Ystradowen'. The Final Report of the application states that "Ystradowen is considered a sustainable settlement for further housing development" – i.e. "additional land should be allocated in this location".

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan (see Appendix B), a similar 'scoring' exercise has been undertaken as part evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage can be seen below for reference:
BP18 Candidate Ste Assessment at Preferred Strategy Stage
As demonstrated above, there has been a positive change to the scoring attributed to the site ('Land at Ystradowen'). The change is a positive change to the 'Infrastructure Availability' section changing from: 'Grey' (no score) to 'Amber'. Infrastructure Availability is outlined as: "Existing or proposed services would be suitable subject to local improvements without impacting on development viability and/or delivery timescales" (see below):
The explanation for the scoring provided by the Vale sets out that "Sites will be assessed against the availability of water connections to the site, in addition to the method of foul sewage disposal from the site. Consultation shall be undertaken with DCWW to determine whether there is sufficient capacity to the wastewater treatments works, and how it links into DCWW's Capital Investment Programme.
Where consultation indicates limited capacity, or the site is located away from a viable connection this may impact on the deliverability/viability of a site should this require significant connection costs or upgrades. Consequently, the Council shall require site proposers to undertake detailed site viability assessment to determine the impact that additional cost shall have on development cost and deliverability timescales."

As set out above, this is a positive change. This is most likely derived from the allocated site ('Land off Sandy Lane, Ystradowen') currently being "built out", with work commencing on site that would facilitate and improve the 'Infrastructure Availability'. This re-iterates the point made previously re the incorrect assessment reached, and the ever changing position of this site – which will only improve given the neighbouring allocated site ('Land off Sandy Lane, Ystradowen') being "built out".

Land West of Maendy Road, Aberthin (Site ID: 2299)

There are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and the site the subject of these representations. It is therefore considered pertinent to assess and compare the suitability of 'Land West of Maendy Road, Aberthin'. Not least as 'Land at Ystradowen (Site ID: 4060)' is for a "small-scale affordable housing led development in a minor rural settlement", within "the ward of Cowbridge".

The site 'Land West of Maendy Road (Site ID: 2299)' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however from our review of the evidence base submitted as part of the Housing Trajectory consultation, there was no assessment and critique of this site at this stage. This raises questions regarding the "soundness" of this site, given it appears this sites acceptability and inclusion was pre-determined.

The site ('Land West of Maendy Road') has since had a detailed assessment and critique published, however concerns still remain regarding the "soundness" of the site which forms part of the intended housing land supply. The 'Stage 2 Detailed Site Assessment' summary undertaken for 'Land West of Maendy Road' has been extracted below:

"The site is proposed for a small-scale affordable housing led development in a minor rural settlement, which would accord in principle with the strategy. Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent.
The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that."

As mentioned previously, there are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)' (the subject of these representations). Firstly 'Land at Ystradowen (Site ID: 4060)' is also for a "small-scale affordable housing led development", that is "in a minor rural settlement" (Ystradowen). Accordingly, it should follow that as 'Land West of Maendy Road, Aberthin (Site ID: 2299)' "would accord in principle with the strategy", 'Land at Ystradowen (Site ID: 4060)' would also "accord in principle with the strategy".

Furthermore, there is no material difference between the following assessment of Aberthin and Ystradowen:

"Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent."

There is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms.

As set out in our representations to the Preferred Strategy, we reviewed the key services in proximity to the site. The following services were identified as part of that review:

• In terms of public transport, there are two bus stops located approximately 0.2 miles (4-minute walk) from the site ('Land West of Maendy Road'), with the 321 providing services between Llantwit Major and Talbot Green;

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin;

• The site is also located 0.2 miles (4-minute walk) from The Farmers Arms Pub and 0.2 miles (4-minute walk) from The Hare and Hounds Inn; and

• The site is located 0.2 miles (5-minute walk) from Aberthin Village Hall.

Given the above, "The settlement (Ystradowen) is also served by public transport".
Furthermore, Ystradowen is located only 2.7 miles from Cowbridge (9-minute bus journey). The "primary and secondary school provision with the wider range of services and facilities in Cowbridge" mentioned in relation to Aberthin are therefore also in close proximity to Ystradowen.

Given the above, any candidate site at 'Land at Ystradowen' (the subject of these representations – Site ID: 430 / 4060) is no less sustainable than the site at Aberthin (Site ID: 2299).

Not least as the following additional key services are located within Ystradowen and therefore in close proximity to the promoted site:

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'; and
• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Furthermore it is important to note that the above scoring criteria is very limiting, and does not take into account the important role and proximity of settlements in a wider context. For example, it does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant) – see Appendix B for full details.

In addition, as set out within the representations made in relation to the House Trajectory (Appendix C), the following extracts have been taken from the Officer's Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:
As set out above, it is important to note that the Final Report of application ref. 2013/00856/OUT states that "Ystradowen is considered a sustainable settlement for further housing development", due to "the sustainable nature of the settlement". Furthermore, the Final Report of app ref. 2023/00948/FUL states:

• "Notwithstanding this, the site is located in close proximity to local services and there is a bus stop located nearby. Whilst the comments relating to the reliance and frequency of the bus services have been considered, there still remains a bus service in the area"; and
• "Firstly, as aforementioned, many neighbouring comments refer to the site as unsustainable and have commented on the suitability of public transport and cycle routes etc. This has been addressed above."

The above clearly evidences that the location has previously been endorsed as, and is currently still found to be, sustainable.

Accordingly, it can be considered therefore that if the proposed allocated site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen (Site ID: 430 / 4060)' is equally suitable to be an Affordable Housing Led Allocation.

The second section/paragraph of the assessment states:

"The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that."
'Land at Ystradowen (Site ID: 4060)' is also located within "the ward of Cowbridge". As per the above and outlined by the Authority, there is "a need for 230 additional affordable units over the next 15 years". It is clear therefore that there is a need for additional affordable units in this ward, and this site would therefore also help to alleviate this need.

This position is a direct contradiction of course of the assessment/conclusion for 'Land at Ystradowen (Site ID: 4060)' which stated "it is not considered that additional land should be allocated in this location". It is clear from the above however that "additional land should be allocated in this location" to satisfy this "need for 230 additional affordable units

over the next 15 years" – which 'Land at Ystradowen (Site ID: 4060)' can do. This is not least the case given the detailed arguments, case and representations presented and evidenced previously above and in Appendix B & C.
To briefly reiterate there is a clear overreliance on 'rolled forward' sites / existing allocated sites which has resulted in the unmet need deriving from the existing LDP being still present. A greater level of provision for new allocations should therefore be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply, so these can "make an important contribution in meeting" the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" – which 'Land at Ystradowen (Site ID: 4060)' can do.

As set out within the representations made in relation to the housing trajectory (see Appendix C), a further key consideration to note and one which does differentiate between the relative merits of the 'Land at Maendy Road, Aberthin' and 'Land at Ystradowen' is that the LDP Proposals Map demonstrates that 'Land West of Maendy Road' is within a Special Landscape Area - see below:
Vale of Glamorgan Proposals Map (Land West of Maendy Road outlined in red
Under Policy MG17 'Special Landscape Areas' it is considered that development in SLA could pose an "unacceptable harm to the important landscape of the area". Accordingly, this development and proposed allocation could therefore cause "unacceptable harm to the important landscape of the area".

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any "unacceptable harm to the important landscape of the area".
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)
It is noted that the detailed assessment scores the site 'amber' in respect to Special Landscape Area (refer to / see later section for full details), with the assessment methodology setting out that "the site is located within a Special Landscape Area/The Glamorgan Heritage Coast and the development may result in little or no change in character and little or no significant effect on landscape character and visual amenity."
A detailed assessment of the impact upon the SLA in respect to the development of 'Land West of Maendy Road, Aberthin' should therefore be, and will need to be, undertaken as part of any planning application. If it is found that the site causes "unacceptable harm to the important landscape of the area", this will lead to this proposed allocation being at risk of not being delivered. This will be as a result of its impacts and acceptability at the planning application stage that the landscape and visual impact of development of the site is unacceptable. As such, these proposed affordable units are at a potential considerable risk of being lost and not satisfying the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" – which 'Land at Ystradowen (Site ID: 4060)' can do as it is not located in an SLA.

In addition the draft housing trajectory set out that "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" is not provided for. This is clearly an issue. Given however 'Land at Ystradowen' does not sit within a SLA – and so not pose any potential concern or cause any "unacceptable harm to the important landscape of the area" – the allocation of this site would be more suitable and "safer" - as there would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for, and the need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" would be satisfied.

As mentioned previously, a detailed assessment and critique has now been undertaken of 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part evidence base for the Deposit Plan using the similar 'scoring' exercise. As such, it is again pertinent to consider and respond to the Council's 'scoring' exercise assessment of the site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part of these representations.

The 'Summary of Assessment of New Candidate Sites' table can be seen overleaf for reference:
BP18A Candidate Site Assessment at Deposit Plan Stage
A comparison between the site assessments undertaken for both 'Land West of Maendy Road, Aberthin (Site ID: 2299)' (on the left), and 'Land at Ystradowen (Site ID: 4060)' (on the right) has been undertaken, and can be seen below for reference:

Having undertaken a review of the scoring for both 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)', it is clear that 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)':

• 'Land at Ystradowen (Site ID: 4060)': 17/33 criteria are scored green = 52%

• 'Land West of Maendy Road, Aberthin (Site ID: 2299)': 12/34 criteria are scored green = 36%

It is clear therefore given the above that 'Land at Ystradowen (Site ID: 4060)' is a better site, and should be allocated accordingly.

One key example to note is how the criterion 'Access to Services and Facilities' has been scored. For 'Land at Ystradowen (Site ID: 4060)' this has been scored green, yet for 'Land West of Maendy Road, Aberthin (Site ID: 2299)', this has been scored red. Given this, this corroborates the position outlined previously above that, if the proposed allocated site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen (Site ID: 430 / 4060)' is equally as sustainable – in fact considered more suitable (given its higher scoring in this respect).

Furthermore, we question the "soundness" of the assessment of 'Land West of Maendy Road, Aberthin (Site ID: 2299)', given that 7/34 (21%) of the criteria do not appears to have not been assessed – i.e. 7/34 (21%) of the criteria are scored grey. This raises questions regarding the "soundness" of this site, given it appears this sites acceptability and inclusion was pre-determined.

It is clear therefore that if 'Land West of Maendy Road, Aberthin (Site ID: 2299)' has been deemed acceptable for allocation, yet 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than this site, 'Land at Ystradowen (Site ID: 4060)' should also be deemed acceptable and be allocated. Not least as the site is "proposed for a small-scale affordable housing led development in a minor rural settlement … would accord in principle with the strategy", and "could make an important contribution in meeting "a "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge".

Summary and Conclusion

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Deposit Plan published as part of the consultation.

In terms of SECTION 4, and a response to the Candidate Site Assessment at Deposit Plan Stage, the following key points have been made:

• The Council's 'Stage 2 Detailed Site Assessment' justification for 'Land at Ystradowen (Site ID: 4060)' is fundamentally incorrect;

• Given the material positive similarities between 'Land at Ystradowen (Site ID: 4060)' and 'Land West of Maendy Road, Aberthin (Site ID: 2299)', which has been deemed acceptable and allocated, 'Land at Ystradowen (Site ID: 4060)' should also be deemed acceptable and allocated accordingly;

• 'Land at Ystradowen (Site ID: 4060)' would help to alleviate and satisfy "a need for 230 additional affordable units over the next 15 years" within "the ward of Cowbridge"; and
• 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)', and so should also be deemed acceptable and be allocated;

Ultimately, 'Land at Ystradowen (Site ID: 4060)' is "proposed for a small-scale affordable housing led development in a minor rural settlement", and as such "would accord in principle with the strategy". It would therefore "make an important contribution in meeting" the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge".

We would therefore object the Council's assessment that the site is not considered suitable for development.

Summary of These Representations

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

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

Preface

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

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

8. Detailed comments in respect to 'new' sites;
9. Credentials of this site subject to this submission; and
10. Conclusions Procedural Consultation Matters
Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

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

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:
Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the east of Coliwinston, Colwinston.

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

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

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

Timing Assumptions underpinning the Trajectory

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

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

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

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

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal

submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

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

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

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

Housing Delivery Rate Assumptions

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

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.
Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.
The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.
Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of

Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.
Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

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

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

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

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:
Table 6: Existing LDP allocations to be carried forward
The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

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

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

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

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

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

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

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

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its

current form accordingly.

Geographic distribution of the 'new' sites / provision

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

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

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

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".
As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision, and as such, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations

Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
Candidate Site Stage 2 Assessment (Site Ref. 404)
The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:
"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

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

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

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

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National

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

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

Despite the absence of site-specific assessment criteria, as the RLDP preferred strategy states a key objective guiding site selection is that the Plan will "provide for vital and vibrant rural communities whilst protecting the countryside through the delivery of growth in sustainable locations related to the settlement hierarchy alongside the provision of supporting infrastructure" (Objective 7 'Fostering Diverse Vibrant and Connected Communities'), it is reasonable to assume that the Council considers 'Land West of Maendy Road' to be a 'sustainable' location.

Given this, we have reviewed the key services in proximity to the site. The following services were identified:

• In terms of public transport, there are two bus stops located approximately 0.2 miles (4-minute walk) from the site ('Land West of Maendy Road'), with the 321 providing services between Llantwit Major and Talbot Green.

• The site is also located 0.2 miles (4-minute walk) from The Farmers Arms Pub and 0.2 miles (4-minute walk) from The Hare and Hounds Inn.

• The site is located 0.2 miles (5-minute walk) from Aberthin Village Hall.

Aberthin is in close proximity (1.2 miles/14-minute walk) to the key settlement of Cowbridge - which is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Considering this, there is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms. Given that Ystradowen is located only 2.7 miles from Cowbridge (9- minute bus journey), the candidate site at 'Land at Ystradowen' is no less sustainable than the site at Aberthin. The following key services are within Ystradowen and therefore in close proximity to the promoted site:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin.
• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Accordingly, it can be considered therefore that if the proposed allocated site 'Land West of Maendy Road, Aberthin' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen' is equally suitable to be an Affordable Housing Led Allocation.
Furthermore, to reinforce the above position and to illustrate and evidence the site's sustainability, the following has been taken from the Officer's Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:
Reference is made in the Final Report of app ref. 2013/00856/OUT which states that "Ystradowen is considered a sustainable settlement for further housing development", due to "the sustainable nature of the settlement".

Furthermore, the Final Report of app ref. 2023/00948/FUL states:

• "Notwithstanding this, the site is located in close proximity to local services and there is a bus stop located nearby. Whilst the comments relating to the reliance and frequency of the bus services have been considered, there still remains a bus service in the area."

• “Firstly, as aforementioned, many neighbouring comments refer to the site as unsustainable and have commented on the suitability of public transport and cycle routes etc. This has been addressed above.”

The above clearly evidences that the location has previously been endorsed as, and is currently still found to be, sustainable.

A further key consideration to note and one which does differentiate between the relative merits of the ‘Land at Maendy Road, Aberthin’ and ‘Land at Ystradowen’ is that the LDP Proposals Map demonstrates that ‘Land West of Maendy Road’ is within a Special Landscape Area - see overleaf:
Vale of Glamorgan Proposals Map (Land West of Maendy Road outlined in red)
Under Policy MG17 ‘Special Landscape Areas’ it is considered that development in SLA could pose an “unacceptable harm to the important landscape of the area”. Accordingly, this development and proposed allocation could therefore cause “unacceptable harm to the important landscape of the area”.

‘Land at Ystradowen’ by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any “unacceptable harm to the important landscape of the area”.
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)

This is a significant factor to consider. ‘Land West of Maendy Road, Aberthin’ causing “unacceptable harm to the important landscape of the area” will lead to this proposed allocation being at risk of not being delivered by virtue of detailed assessments of its impacts and acceptability at planning application stage holding that the landscape and visual impact of development of the site is unacceptable. As such 25 affordable units will be lost from the proposed affordable 122 units, and ultimately being lost from the overall housing land supply. As stated in the draft housing trajectory “there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities”. There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a “small scale affordable housing led development” which is needed to “respond to local affordable needs and help sustain services and facilities within these rural communities” is not provided for. This is clearly an issue. Given however ‘Land at Ystradowen’ does not sit within a SLA – and so not pose any potential concern or cause any “unacceptable harm to the important landscape of the area” – the allocation of this site would be more suitable and “safer” - as therefore would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where “there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities”, are provided for. As such the proposed housing trajectory would be maintained.
Land North of West Winds Business Park, Fferm Goch

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

Candidate Site Stage 2 Assessment (Site Ref. 398)
As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

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

Given the fact the site scores red in ‘Sustainable Transport – Public Transport’, this shows the site is not served by public transport connections within 800m, as outlined in the key below:
Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states “New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes”. Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states “new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport.”

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

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:
In respect of the above, Preferred Strategy 6.40 states the need “To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy”. To further

highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

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

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

When comparing this with 'Land at Ystradowen', the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below. With reference to the above:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green.

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities.

Furthermore, the settlement of Ystradowen has been ranked highly in the VoG Sustainable Settlements Appraisal, scoring a total of 14 points according to the distance to key services and facilities available. This places Ystradowen 26th out of a total of 87 settlements. As a result, this would be deemed a suitable area to accommodate growth.

As stated above the key settlement of Cowbridge is located in close proximity being only 2.7 miles to the south and a 9-minute bus journey. Cowbridge is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Furthermore, it is important to note that the above criteria does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant). These areas comprise for example the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Given the above, 'Land at Ystradowen' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Ystradowen' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural

communities", are provided for. As such the proposed housing trajectory would be maintained.
Land to the East of Colwinston, Colwinston

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

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

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref. 2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.
Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

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

There has been a significant change in the position and circumstances since the promoted site herein was assessed at Candidate Site Stage and the Assessment undertaken. The Stage 2 Assessment of the site concluded the following: 'Whilst adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.' The assessment/conclusion implies that as this site ('Land off Sandy Lane, Ystradowen') has not been built out and is "currently under review", it suggests that 'Land at Ystradowen' (430) does not adjoin the existing LDP settlement boundary. Given recent developments however associated with the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024) and the site being currently being "built out" and work commencing on site, the site no longer adjoins "the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review". Accordingly, and given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.
The following specific photo evidences 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48) is being built out the western boundary of the promoted Site ID 430. This therefore clearly highlights that the site's boundary is representing the existing settlement limit in the existing development plan. Accordingly, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the existing LDP settlement boundary.
Summary of These Representations

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

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

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gr
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3gt
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g4
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g7
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3g8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gv
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gc

7057 Support

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle.

Full text:

Introduction

These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.

Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.

Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.

That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.

The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.

The remainder of these representations address the specific policies of the Deposit Plan.

Deposit Plan Plan Period Position: Object

Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.

On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.

Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.

Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part

Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.

Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.

This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.

St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.

Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:

"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)

Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:

St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper

(June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains

rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."
The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.
5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.
In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of

new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.

Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.

The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.

There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.

In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.

Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part

Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.

The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.

That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.

There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix. The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.

In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.

Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.
The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.
8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part
Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.
The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;
• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.
The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for

sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1

alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.
Policy CI1 – Open Space Provision
Position: Support in principle / Object in part
Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.
The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.
There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.
Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health

implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486

Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.

Stage 2 Candidate Site Assessment

The Council's Stage 2 Candidate Site Assessment states:

"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."

The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:

Impact upon Character and Setting of the St Nicholas Conservation Area

Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.

The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:

• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;

• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;

• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and

• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.

Countryside Impacts

The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.

The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.

Agricultural Land Quality

Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.

As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.

Appendix 2 – Summary of Assessment

We comment on the Council's Summary of Assessment as follows:

• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.

• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.

• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.

• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.

• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.

• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.

• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the

retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7058 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence, and which can accommodate proportionate growth in a highly sustainable way. The strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. SP1 should be amended to reflect this.
In our view, the current Deposit strategy has moved too far away from the balanced position on Minor Rural Settlements in the adopted LDP. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's

consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.

Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.

There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.

For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.

Policy SP2 – Settlement Hierarchy Position: Object

Barratt Redrow objects to Policy SP2 in its current form.

The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.

That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.

However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.

The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.

In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.

Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.

Policy SP6 – Housing Requirement Position: Object

Barratt Redrow objects to Policy SP6.

Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.

PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:

"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what

the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."

The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:

"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.

5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.

5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."

Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:

• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;

• Does not actively seek to address the area's ageing demographic;

• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;

• Does not seek to leverage any of the investment into the region through the CCR City Deal;

• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and

• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.

In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.

That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.

The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.

This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.

The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.

There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.

The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.

There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.

In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.

Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part

Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.

The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.

That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.

There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix. The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.

In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.

Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part

Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.

The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of

rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.
8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part
Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.
The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;
• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.
The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-

sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-

adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.
Policy CI1 – Open Space Provision
Position: Support in principle / Object in part
Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.
The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.
There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.
Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of

the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national

policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment
We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the

candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:
Amend SP1.

Sound: Not specified

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7071 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:
The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed.

Full text:
Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly

restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.

The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.

The remainder of these representations address the specific policies of the Deposit Plan.

Deposit Plan Plan Period Position: Object

Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.

On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.

Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.

Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part

Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.

Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.

This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.

St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.

Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:

"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)

Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:

St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.

Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.

Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.

There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.

For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic

Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."
The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of

homes and jobs.
5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.
In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing

delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.

The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.

The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a

1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.

Policy SP6 – Flexibility, housing land supply and trajectory Position: Object

Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.

The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.

In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.

The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.

The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.

Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.

The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.

There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.

In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.

Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part

Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.

The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.

That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.

There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.

The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.

In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.

Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part

Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.

The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.

In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability,

that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.

8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.

The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.

Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:

• the Plan is overly reliant on a small number of key sites;

• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;

• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and

• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.

The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.

Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.

The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:

• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.

• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.

• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.

All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.

In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.

Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part

Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.

However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the

community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.
Policy CI1 – Open Space Provision
Position: Support in principle / Object in part
Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive

and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.
The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.
There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.
Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a

Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.

There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.

The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.

Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.

Land at St Nicholas / omission from the Deposit Plan Position: Object to omission

Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.

The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.

Deposit Plan Conclusion

Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.

In particular:

• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;

• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;

• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;

• the Plan relies too heavily on key sites, rolled forward sites and windfalls;

• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and

• the omission of St Nicholas is not justified by the Council's own evidence base.

The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.

For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.

Candidate Site Register - Site ID 486

Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.

Stage 2 Candidate Site Assessment

The Council's Stage 2 Candidate Site Assessment states:

"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."

The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:

Impact upon Character and Setting of the St Nicholas Conservation Area

Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.

The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:

• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;

• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its

setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.

Countryside Impacts

The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.

The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.

Agricultural Land Quality

Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.

As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.

Appendix 2 – Summary of Assessment

We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.

Suitability for Allocation and Key Benefits

For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.

The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the

Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7096 Support

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Barratt Redrow Homes [2669]
Agent: Turley

Summary:

The identification of St Athan as a settlement where development should be concentrated is supported.

Full text:

Policy SP1 - Sustainable Growth Strategy
Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.
It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.
In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"
Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be

concentrated is supported.

Policy SP2 - Settlement Hierarchy
The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable. As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Policy SP4 - Placemaking
We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.
The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses... ' or to be developed at 'high densities... and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.
Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Policy PGDl - Creating Well Designed and Inclusive Places
There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan

Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be

required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy Cll - Open Space Provision
The wording of Policy Cll, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy Cll should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling

metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy CII requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7136 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Peter Stone Properties Ltd [1182]
Agent: Geraint John Planning Ltd

Summary:

We object to the spatial growth strategy within the Deposit Plan and consequently question its soundness and delivery. Specifically, we object to the 'Strategic Growth Area' (SGA) strategy, which creates an over-reliance on a single defined area while neglecting the Rural Vale.

The Plan is internally inconsistent: while it recognises a critical need for affordable housing—particularly for an increasingly ageing population and to prevent the out-migration of younger working-age residents—the lack of allocations in Minor Rural Settlements (such as Bonvilston) undermines these objectives. The current strategy fails to address the high entry costs in rural areas (where average prices exceed £800k) and ignores the Local Housing Market Assessment (LHMA) requirements for affordable delivery outside the SGA.

Furthermore, the Plan fails to account for the functional relationship between the Western/Northern Vale and external employment hubs in Bridgend and Talbot Green/Llantrisant. By focusing growth solely on rail-accessible settlements, the Plan ignores the 'inherently rural' nature of the Vale and fails to support sustainable bus-based transit and local employment opportunities. To be sound, the Plan must pursue a strategy that allocates a greater proportion of small-to-medium sites in rural settlements to ensure delivery in the short-to-medium term and to create a more balanced demographic and economic future for the Authority.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed ‘Strategic Growth Area’ which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £800,000 over the last 12 months, there is a clear and established need for new homes in the Bonvilston area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county’s ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the ‘Population Change’ chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: “There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery.”
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: “Allowing for small scale affordable

housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Bonvilston. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are

allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)

• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

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

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only

approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise

affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites – not least given that 3 of the 4 allocated affordable housing-led sites are located west of Cowbridge.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land South of A48, Bonvilston (Site ID: 435 / 3857) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area (which Bonvilston is located within), and a need for 242 affordable homes in the Wenvoe housing market area. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

Securing further delivery of Affordable Units

As set out above, it can be assumed that the affordable housing-led allocated sites only provide 61no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included

within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to meet the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Bonvilston and the proposed site. As outlined within these representations, it is considered that the site (ID 435 / 3857) represents a sustainable, deliverable and acceptable site. This proposed allocation is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

• Cowbridge Comprehensive School;
• St Nicholas Primary School;
• Cowbridge Health Centre; and
• Cowbridge town centre for various Retail Services.

Accordingly, the settlement of Bonvilston represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Bonvilston, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be

permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 "For the purposes of this policy, 'small-scale' will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites

with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

Deliverability of the Site

In summary, the site seeks to deliver the following key elements:

• In summary, the opportunity of the site seeks to deliver:
• Residential development comprising up to 25 dwellings, with at least 50% affordable housing in accordance with Policy SP2,
• Highways infrastructure within the site;
• Upgraded access to the site;
• Strong legible pedestrian and cycle connections throughout the site and with the existing settlement;
• Green Infrastructure; and
• Sustainable Drainage Systems (SuDS).

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land South of the A48, Bonvilston (Site ID: 3857) sets out that the position of the site at the Deposit Stage is as follows:

"Notwithstanding the amendment from a market led to an affordable housing led scheme (original CS 435), the other reasons why the site was previously discounted still remain.
The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area.
Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48.
The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable. There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing."
Conservation Area
In terms of the assertion that "The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area, this is strongly disputed.

Whilst it is acknowledged that the site lies within the Bonvilston Conservation Area, the conclusion that it would be adversely affected is not considered to be accurate. Firstly, the site as it currently stands, consists of an open field. This does not match the conservation area which is characterised primarily by residential dwellings of varying densities, and as such, it is considered that development of the site with sensitively designed buildings would enhance as opposed to harming its surroundings.

Secondly, the large residential development to the north of the site, 'Land at Sycamore Cross' ref. 2015/00960/FUL encroaches on the Bonvilston Conservation area but was deemed acceptable by the LPA. Although not all of the site is within the Conservation Area, it's encroachment and presence adjoining and surrounding a large proportion of the area is considerable and was deemed acceptable by Officers in 2017. Given this, a development at the Land South of the A48 should be deemed acceptable, as it follows the same principles albeit at a much smaller scale.

Highways
As for the statement that "Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48", this is also strongly disputed.

The site is located immediately adjacent to the adopted highway where it is proposed to upgrade and enhance the existing gated access point. Due to the existing access point, it is not considered that 'major' highway mitigation works would be needed, rather this would be enhanced and improved as part of the proposed development. Furthermore, given the nature of the road, with long views extending in both directions, it is anticipated that appropriate visibility

splays could be achieved to enable safe access and egress. As such, it is considered that the site would achieve appropriate highway access within the need for "major" highway mitigation works.

Agricultural Land Classification
The Detailed Site Assessment also sets out that "The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable." This is strongly disputed.

A review of the Agricultural Land Classification Predictive Map indicates that the site lies primarily within 'Grade 2: Very good quality agricultural land' but no Grade 1 land is present. Further assessment and tests to establish the quality would therefore be undertaken in due course to confirm the quality of the land. However, it is not considered that it would be suitable to farm in any event given the location immediately adjoining existing residential development and the fact that it is within private ownership. Overall, given that the site is relatively small with a gross area of 0.88 hectares, it is not considered that its development would result in a detrimental or significant loss of agricultural land – not least given that site is not capable of beneficial agricultural production due to its limited size.

Housing / Housing Land
Further to the above, it is also set out that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing", however, this is not considered to be entirely accurate.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area and a need for 242 affordable homes in the Wenvoe housing market area. This need has not been met through the allocations of sites within the RLDP, nor has it been met through outstanding commitments.

As outlined in Annex 1, it can be assumed that the affordable housing-led allocated sites will only provide for 61no. affordable dwellings within the Rural Vale, comprising 4no. sites that are expected to deliver approximately 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. Therefore, more sites should be allocated in order to secure the delivery of a higher number of affordable housing units to meet the target.

As set out within Annex 1, it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, however, there is serious concern regarding the deliverability of these sites, which would result in a significant gap in the total affordable housing that is delivered. Therefore, allocating a greater number of affordable housing-led sites would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in the both the overall affordable housing need, and the need for the St Nicholas & Llancarfan housing market area, being unmet, with demand continuing to outstrip supply.

The LHMA 2023 sets out the existing stock and planned supply of affordable housing over the next 5 years (up until 2028). This assessment found that the housing market area of St Nicholas & Llancarfan has a committed supply of 4no. one beds, 11no. two beds, and 3no. three beds, with 2 no. three beds as expected re-lets. The assessment also identifies a committed supply of 39no. units for intermediate housing.

The LHMA also sets out the existing stock and planned supply for Wenvoe, identifying the committed supply of social rent homes to be 12no. one beds, 11no. two beds, and 5no. three beds, with 7no. one beds and 8no. two beds as expected re-lets. There is no committed supply for intermediate housing in Wenvoe.

It should be noted that the development of 'Land East of Nicholas' (Campbell Court and Cae Newydd), has now been completed, and as such, can not form part of the housing land available. The latest Pre-Application Response for the site subject to these representations (Land South of the A48, Bonvilston) accounted for the development of the site in

St Nicholas, stating that "even after the developments at St Nicholas and Culverhouse Cross, there was the need in the Wenvoe ward for 1 Bed 71, 2 Bed 49, 3 Bed 29, 4 Bed 7, 5 Bed 5, Total 161".

It should also be noted that there are existing commitments within the Bonvilston area ('Land to the east of Bonvilston'), however, the deliverability of the existing commitment is seriously questioned. Application Ref. 2015/00960/FUL was approved in July 2017, with the Housing Land Supply and Housing Trajectory Report (December 2025) confirming that of the total 120 units permitted, only 40 had completed by 1st April 2025, with the remaining 80 units not started by this same date. Of the 80 units not started, 25 units are affordable homes.

It is well known that phase 1 of the development at 'Land to the east of Bonvilston' has faced difficulties which has led to the development remaining incomplete. This does of course put into question the overall deliverability of the site, and raises concerns about the units that were, and still are, required within the Bonvilston area.

The allocation of the site promoted herein would not only help in the short term in meeting the overall affordable housing target for the Plan, but would also assist in meeting the unmet needs of affordable housing within Bonvilston – not least given the serious concern regarding the deliverability of the committed supply of housing within the St Nicholas & Llancarfan housing market area.

For the reasons set out above, and in light of the information provided within the LHMA 2023 and the Housing Land Supply and Housing Trajectory Report (December 2025), it is evident that there is considerable need for affordable housing within Bonvilston, and accordingly, the housing market areas of St Nicholas & Llancarfan, and Wenvoe. There have not been any sites allocated to assist within meeting the local need, and more sites should be allocated in order to secure delivery of a higher number of affordable housing units to meet the overall target of the Plan.

The contention that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the

delivery of affordable housing" is therefore strongly disputed – not least given that there is a clear and evident need to allocate more affordable housing-led sites in order to meet the target set out in the Plan.

Interim Summary

In summary, it is considered that the site subject to these representations would not have an adverse impact on the character and setting of the Bonvilston Conservation Area, nor would major highway mitigation works be required to enable safe vehicular access on to the A48. Moreover, it is considered that the site's classification as BMV Agricultural Land does not pose a fundamental constraint to development – as the site represents a relatively small parcel with a gross area of 0.88 hectares, which is not capable of beneficial agricultural production due to its limited size.

There is also a considerable need for the affordable housing in Bonvilston and the housing market area of St Nicholas & Llancarfan. The site promoted herein would assist in meeting these local needs and should be allocated accordingly.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage

As demonstrated above, there has only been one change to the scoring attributed to the site, this being a change from 'red' to 'amber' for 'Developer Interest'. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with these representations accordingly (see Appendix B).

Whilst detailed submissions were made on the previous assessment, it is considered pertinent for the scoring of the key criteria's to be addressed as part of these representations. As such, these have also been discussed below.
Developer Interest

As set out above, the Detailed Site Assessment for 'Developer Interest' has changed from 'red' to 'amber'. The assessment methodology for this section of the assessment has been extracted below for reference.

As set out above, 'amber' refers to there being no development interest identified at this stage, however, there is evidence to indicate that the site is being actively promoted by the owners.

The representations made to the Preferred Strategy (Appendix B) sets out that whilst the site does not yet have an agreement with a developer to take on the land, it is considered that this would be achieved should the site be allocated, and planning permission granted. Newydd Housing association have been engaged previously and had agreed to take the site forward as a 100% affordable scheme, albeit is also considered that they could take on the affordable units as part of a mixed tenure scheme.

In addition to Newydd, the site promoter has also received an offer from a private social housing provider who would be prepared to support the site as a mixed tenure scheme.

This position has not changed since the Preferred Strategy stage, and is considered that there is continued developer interest for the site. This is not considered to change at any point – not least given the discussions held between the owners of the site in questions and developers of interest.

Environmental and Physical Constraints

As set out at the Pre-Application Stage. the site underwent a Preliminary Ecological Appraisal in September 2022 which identified that whilst some precautionary measures were recommended in terms of protecting priority habitats and reptiles, the site is not fundamentally constrained from development on ecological terms. Given this, it is considered that further ecological surveys would be undertaken at the planning stage to inform any development proposals and ensure the safeguarding of the natural environment.

Access to Key Services (Retail, Primary Schools, and Health Services) and to Services and Facilities

As set out within the representations made to the Preferred Strategy, the site is located within a maximum of a 20-minute bus journey to a version of every key service listed, due to the proximity of the site to settlements such as Cowbridge, Culverhouse Cross and St Nicholas. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Bonvilston without the need to travel by car.

To reiterate, the site 'Land South of the A48, Bonvilston' is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Concluding this allocation as 'unsustainable' in regard to 'availability of local facilities in and around settlements' is not accurate. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

• Cowbridge Comprehensive School;
• St Nicholas Primary School;
• Cowbridge Health Centre; and
• Cowbridge town centre for various Retail Services.

It should also be noted that Bonvilston contains a number of facilities within a short and level walking distance of the site, including the village shop and Café, as well as the Red Lion Public House.

Given the accessibility of the site to other settlements, and the fact that these are made accessible by bus and active travel routes, it is considered that the site should be concluded as sustainable in regard to access to key services.

Summary and Conclusion

As evidenced above, and within the representations made to the Preferred Strategy (Appendix B), there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location, and site, are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

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

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

Preface

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

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

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

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

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

Other Housing Allocations
• Land south of Clive Road, St Athan;

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

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

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

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

Timing Assumptions underpinning the Trajectory

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

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

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

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

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

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

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

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

Housing Delivery Rate Assumptions

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

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

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

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

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

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

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

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

recruitment and training".

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

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

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

Key Sites

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

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

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

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

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

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

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

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

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

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

Geographic distribution of the 'new' sites / provision

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

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and

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

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

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

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

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

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

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

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

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

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

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

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

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

Land West of Maendy Road, Aberthin

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

Land North of West Winds Business Park, Fferm Goch

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

Candidate Site Stage 2 Assessment (Site Ref. 398)

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

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

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

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

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

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

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

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

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

affordable housing led development" which is needed to "respond to local affordable needs and help sustain services

and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

Land to the East of Colwinston, Colwinston

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

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

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

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

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

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

Summary of These Representations

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

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

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3jp
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3kr
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k3
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k6
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kf
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kh
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z5

7158 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: Wig Fach Property Company Ltd [2373]
Agent: Geraint John Planning Ltd

Summary:

We object to the spatial growth strategy set out within the Deposit Plan and therefore question the delivery and soundness of the Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain an over-reliance of housing growth on this defined area, and the associated absence of growth in other Rural parts of the plan area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan, which includes enabling opportunities to provide employment and business premises within/near to rural settlements. The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the principal settlement and Strategic Growth Area of Talbot Green/Pontyclun/Llantrisant to the north. The current strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural and bus services should be appropriately assessed and focussed on in terms of promoting sustainable development. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to deliver housing in the short and medium term of the Plan period.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ogmore By Sea area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)

Para 5.25 states “Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An ‘affordable housing led’ scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord”.

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

“Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided.”

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision’s clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either Key Settlement, Service Centre settlement or Primary Settlements, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Ogmore By Sea. The Vale is characteristically ‘rural’, and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the “soundness” of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states “The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities”. The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of ‘key sites’ to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

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

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of

1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory

are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when

coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that the should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 124 affordable homes in the St Brides Major local housing market area (which Ogmore is located within). As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

It is questionable whether Wick has the capacity to accommodate 50 new dwellings, given the sustainability and rural nature of the area. As a result, it is suggested that the number of homes allocated in Wick is reduced and that a further allocation in St Brides Major is secured, in order to facilitate supporting the delivery of affordable housing through the housing market area, rather than in one minor rural settlement. The sustainability of Ogmore has been assessed, both by the Council through the Sustainability Appraisal and again, through our assessment of the site.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a

target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4 % of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.

Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ogmore and the proposed site. As outlined within these representations, it is considered that the site (ID xxx) represents a sustainable, deliverable and acceptable site. The site is within a maximum of a 22- minute bus journey to a every key service listed, due to the proximity of the site to settlements such as Bridgend. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Ogmore By Sea without the need to travel by car. The site is located within 5 miles of Bridgend, and within a maximum 22-minute bus journey of the following services:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre for various Retail Services

Moreover, Ogmore has benefitted from the recent development of the Ogmore By Sea Village Hall, which provides space for community activities and events to take place. The hall also includes a coffee shop (Welsh Coffee Company), which only adds further to the daily services provision available within the settlement. Access to the hall and coffee shop is directly provided for pedestrians from the Main Road, which allows for direct access from the site.

Accordingly, the settlement of Ogmore represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

It is acknowledged that the site also lies within the Glamorgan Heritage Coast and this point is addressed further below.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ogmore By Sea, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 "For the purposes of this policy, 'small-scale' will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

Policy DNP3 – Glamorgan Heritage Coast

Given that the site is located in the Glamorgan Heritage Coast, it is noted that the following policy is of relevance to any future development on the site. Criteria 4 of Policy DNP3 states:

"The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development that accords with National Policy."
It is also noted that supporting Para 6.422 "In seeking to protect the Glamorgan Heritage Coast, the Council acknowledges that there are some built up areas within the boundary, including the Minor Rural Settlement of Ogmore. In addition, the Vale of Glamorgan rail line crosses part of the Heritage Coast designation in the location where a new station at St Athan is proposed. Whilst being mindful of the need to protect the special qualities of the Glamorgan Heritage Coast, the Council accepts that development within these areas is appropriate, subject to relevant policies of the Plan"(GJP emphasis).

We would offer general support for this policy, and consider this to provide flexibility which allows for certain forms of development. However, we would suggest that the policy wording should be amended to reflect that 'housing' should be supported in the Glamorgan Heritage Coast, providing that the policy exceptions are met. Therefore, the following amendment is proposed as part of the policy should be changed to include "small scale housing" or something similar. The proposed amendments to Policy DNP3 are outlined below in red:

"The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development, including small-scale housing proposals that accords with National Policy."

Again, this would ensure that suitable housing developments can be delivered in the Plan period, to meet the housing needs of the Vale of Glamorgan – particularly in respect of affordable housing.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to Policy DNP3 – Glamorgan Heritage Coast, given the lack of recognition for the potential for small-scale housing proposals;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land at Hazelwood, Ogmore By Sea (Site ID: 3855) sets out that the position of the site at the Deposit Stage is as follows:

"The original site as ruled out as the development would represent unacceptable intrusion in to the open countryside. Whilst the site has now been identified for an affordable housing led development, the original reason for ruling it out still remains."
In terms of the assertion that "the development would represent an unacceptable intrusion into to the open countryside", this is strongly disputed, in that the development of the site would represent a natural rounding off of the existing settlement boundary. An extract of the site relative to the settlement boundary is provided below, which clearly shows that the development of the site would not extend beyond the existing settlement pattern that exists in Ogmore.

Site Outlined in Red and Settlement Shaded in Blue
As clearly demonstrated in the above mapping, the site would extend no further eastwards than the existing housing area to the south of the site. Equally, the site would not be extending any further north than the existing settlement pattern in Ogmore. This position is further supported by the wider aerial view of the site provided overleaf:

Wider Aerial View of Site Outlined in Red and Settlement Shaded in Blue

In summary, it is considered that the proposed allocation of the site represents a logical rounding off of the existing settlement, as depicted in the mapping provided above – where the site follows the existing envelope of the settlement. The site does not extend any further eastwards than the established built form located immediately to the south; indeed, it sits comfortably within the same development line.

As such, it cannot be considered that the site represents an 'intrusion' into the countryside, as the site would be visually and functionally related to the settlement. It therefore follows that the site would be read as part of the settlement, and not the wider rural landscape.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage
As demonstrated above, there are no changes to the scoring attributed to the site. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with this submission (see Appendix A).

Sustainability

Notwithstanding the above, it is considered that the site represents a more sustainable location than what was previously assessed at Preferred Strategy stage, in light of the Ogmore by Sea Hall development. The Hall acts as a community facility, whereby the space is available for hire by local community groups such as birthday parties, weddings, group meetings, and other such similar uses. Moreover, a café (Welsh Coffee Co) is located within the premises which sells both food and drink.

The hall and café are within walking distance to and from the site, where new access facilities have been implemented from Main Road directly to the building, to allow access for pedestrians and cyclists. This is illustrated in the image below:

Walking and Cycling Facilities

The Tusker Rock pub and post office are also located along Main Road, all of which are within walking distance to the site.

Accordingly, the site is well served by new amenities (i.e. community hall) that comprehensively improves the sustainability of the site / settlement, and in turn, improves the sustainability credentials of the site promotion. It therefore follows that the site represents an acceptable location for residential development, and the site should be looked upon favourably accordingly.

It is also the case, as set out in previous representations, that the site is within a maximum 22-minuted bus journey of the following services and facilities:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre.

As such, key services and facilities can be access by sustainable travel over and above the existing level of provision available in Ogmore By Sea (as discussed above).

Accordingly, the relevant 'red' scorings in the Council's assessment should be updated to reflect the site's suitability and sustainability to accommodate the proposed residential development of the site.

Glamorgan Heritage Coast

Insofar as to the position regarding the site's location within the Glamorgan Heritage Coast, detailed submissions are made not only in the Preferred Strategy representations, but also in Annex 1 of this submission. In short, given the pressing need for such development (particularly affordable housing) to come forward in the Plan period to meet ever-

increasing needs, development of this nature should be considered more favourably – not least that, as outlined in this Annex, the site would not extend any further that the existing settlement boundary.

Accordingly, the site would be perceived to form part of the settlement of Ogmore By Sea, and not the wider landscape, and therefore, would not have any detrimental impact on the Heritage Coast in any respect. The scoring should be amended accordingly to reflect this position.

Climate Change

As outlined in previous representations, the development will incorporate climate change measures, such as EV charging points, PV panels, as well as adopting sustainable materials for construction whilst maximising the potential for the dwellings to be energy efficient. Accordingly, the development will be built to high sustainable standards, and therefore, the scoring of the site should be amended as a result.

Summary and Conclusion

It has been evidenced above that there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

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

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

Preface

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

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

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

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

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

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston;

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been

consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

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

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

Timing Assumptions underpinning the Trajectory

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

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

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

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

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

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

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

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

Housing Delivery Rate Assumptions

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

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

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

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

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

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

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

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

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

homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

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

Key Sites

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

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

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable

housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

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

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

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

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

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

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

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

Geographic distribution of the 'new' sites / provision

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

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

received any growth whatsoever over a considerable period of time.

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

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

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

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

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

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

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

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

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

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

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

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

Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP,

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

Land North of West Winds Business Park, Fferm Goch

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

Candidate Site Stage 2 Assessment (Site Ref. 398)

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

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

• Health and Wellbeing.

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

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

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

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

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

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

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

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

When comparing this with 'Land at Hazelwood, Ogmore By Sea, the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below.

With reference to the above:

• In terms of public transport, there are two bus stops located approximately 200m (3-minute walk) from the site ('Ogmore By Sea Post Office'), with the '303' providing services between Llantwit Major and Bridgend.

• The site is located 200m (3-minute walk) from the 'Ogmore By Sea Post Office' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

• The site is also located 50m (1-minute walk) from a children's park.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities. This

Furthermore, the settlement of Ogmore By Sea has been ranked higher than Llangan (which the site 'Land to north and west of Westwinds Business Park' is located within) in the VoG Sustainable Settlements Appraisal, and therefore, is considered to constitute a more sustainable location to accommodate residential growth. Most notably, Ogmore By Sea scores '13' in respect to 'Daily Facilities' whereas Llangan only scores '3', evidencing that residents in Ogmore have much better access to services within the locality as compared to Llangan.

Given the above, 'Land at Hazelwood, Ogmore' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Hazelwood, Ogmore' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help

sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.

Land to the East of Colwinston, Colwinston

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

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

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

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

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

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

Summary of These Representations

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

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

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3zt
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3z4
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z6
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3z8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zv
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zc
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zw

7185 Support

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY
Respondent: H Jones, L Sungur and P John [3741]
Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

The essence of Policy SP1 is supported. The promotion of small-scale affordable housing led development outside of the SGA, as proposed by SP1 is important as this provides essential affordable and market homes in the rural locations of the Vale as well as the SGA.

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis. Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

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

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

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

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

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

SP1 – Sustainable Growth Strategy

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

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

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

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

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

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the RLDP the supporting text of Policy SP2 states:
'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

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

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

Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the

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

PGD2 – Residential Development Densities

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

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

SP6 – Housing Requirement

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

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

SP7 – Affordable Housing Provision

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

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

SP8 – Affordable Housing Requirements

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

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

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

HG4 – Rural affordable housing led sites

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

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

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

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

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

SP13 – Community infrastructure and planning obligations

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

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

CI1 – Open Space Provision

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

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

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

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

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

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

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

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

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

The location of the small allocated site HG4(4) is nestled within the settlement of Fferm Goch. It is built up on both the

northern and southern boundaries, with the main road running along the eastern boundary. There is no unacceptable harm to the SLA of the Upper and Lower Thaw valley.

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

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

7186 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: H Jones, L Sungur and P John [3741]

Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both open market, but particularly Affordable) development across the Vale. Without targeted allocations outside of the SGA, as outlined in Policy SP1, the housing gap will continue to widen, forcing more residents to leave the area and weakening community cohesion.

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis. Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

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

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

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

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

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

SP1 – Sustainable Growth Strategy

The promotion of small scale affordable housing led development outside of the SGA, as proposed by SP1 is important

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

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

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

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

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

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the RLDP the supporting text of Policy SP2 states:
'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

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

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

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

shortfall in numbers as outlined above.

PGD2 – Residential Development Densities

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

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

SP6 – Housing Requirement

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

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

SP7 – Affordable Housing Provision

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

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

SP8 – Affordable Housing Requirements

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

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

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

HG4 – Rural affordable housing led sites

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

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

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

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

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

SP13 – Community infrastructure and planning obligations

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

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

CI1 – Open Space Provision

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

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

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

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

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

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

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

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

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

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

The allocation of the site for residential development does not give rise to unacceptable harm to the special qualities

and characteristics of the SLA, based on LANDMAP information, continues to be preserved.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

7211 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mrs Melissa Plimmer [3599]

Summary:

The RLDP identifies St Athan as a "Strategic Hub," yet it remains the only primary settlement in the Vale of Glamorgan without a direct rail link. Relying on the "Active Travel" aspirations of Policy SP10 is unrealistic for a community where the majority of residents commute to Cardiff, Bridgend, or Barry.

Full text:

Representation on the Vale of Glamorgan Deposit RLDP 2021–2036
Specific Policy/Site Objection:
• Policy SP4.4: Land at Church Farm, St Athan
• Policy SP4.5: Land to the West of St Athan
• Clive Road (Additional Allocation)
• Policy EMP2: MOD St Athan / Bro Tathan
Status: Unsound
1. Introduction
I wish to formally object to the allocation of the above sites and the broader designation of St Athan as a "Primary Settlement" for high-density growth within the Replacement Local Development Plan (RLDP). This allocation fails the Test of Soundness regarding Consistency (with national climate goals) and Effectiveness (deliverability of infrastructure).
2. Failure of Sustainable Transport (Policy SP7 & SP10)
The RLDP identifies St Athan as a "Strategic Hub," yet it remains the only primary settlement in the Vale of Glamorgan without a direct rail link. Relying on the "Active Travel" aspirations of Policy SP10 is unrealistic for a community where the majority of residents commute to Cardiff, Bridgend, or Barry.
The proposed density at the above sites will inevitably lead to an unsustainable increase in private car journeys on the B4265, specifically at the Gileston Road junction and Weycock Cross, which are already at or near capacity.
Concrete infrastructure is needed to be in place prior to any development of the land. Often intentions of infrastructure are not progressed. In addition where infrastructure is not in place prior to housing many commuters will become accustomed to travel by car and wont switch to public transport. It is difficult to see how developments work with Future Wales: The National Plan 2040
Active travel should look at linking key destinations and with the western vale being spread over longer distances more effort should be given to linking population centres with separated bicycle paths and wide accessible pavements. Shared bike / foot paths are inherently dangerous not allowing the safe use of wheelchairs and prams and sufficient use for children and dog walkers. Cycling should not have to stop at every intersection which creates visibility black spots by the way they turn away from traffic.
With current planned housing and that of additional housing in the LDP creating over 1,000 new homes and with each household having 1-2 cars per household this will add significant additional numbers of journeys on already poor road infrastructure. The vale lacks sufficient north / south routes pushing vehicles towards Weycock Cross in Barry which will have its own traffic issues or via Cowbridge with small country lanes. I personally worked in Cowbridge travelling from St Athan where buses would take over 1 hour 10 minutes and even then not arriving in time to start work. In contrast car travel would be 10 minutes or cycle would be 20 minutes but over dangerous roads.
Travel to Barry for meetings at peak times can take over 50 minutes from St Athan with significant delays leading to Weycock Cross and passed the secondary schools even before developments in the RLDP or existing planning. Public transport gets caught in the same traffic issues.
Access into St Athan is already dangerous from the war memorial with one near fatal accident already having taken place since the ‘improvements’ to the junction. Proposals for additional access from B4265 onto developed land would be on a hill with poor visibility and around a blind bend. Currently there is poor visibility leaving St Athan due to the side by side two car exit blocking views in both directions along with more visibility issues looking westward due to traffic furniture and signage.

While Bro Tathan (Policy EMP2) provides jobs, there is no guarantee that the people moving into local developments will work there. If they commute elsewhere, the RLDP fails its own climate goals (Policy SP1) by creating a "commuter colony" rather than a sustainable community.
Reference Policy CI3 (New Community Facilities). The proposed expansion of St Athan Primary School lacks a guaranteed timeline for when these facilities will be operational relative to house completions. New access to the school under existing planning is only 'proposed' and existing access to the school via Rock Road is a poorly surfaced and narrow one way road but is often ignored with traffic coming via Rectory Drive which has a 'No entry except for access' restriction but is not enforced causing large numbers of vehicles into residential areas not built for this type of activity.
Speeding is already a great concern in the village with the current level of vehicle traffic with little compliance with the 20mph speed limit and no enforcement.
3. Coalescence and Loss of Settlement Identity (Policy SSC1)
The scale of development proposed for Church Farm, in conjunction with Policy SP4.5 (Land West of St Athan), threatens the distinct character of the village. The erosion of the "Strategic Gap" between St Athan and Eglwys Brewis violates the principles of Policy SSC1 (Settlement Boundaries). This "urban creep" creates a continuous sprawl that permanently destroys the rural setting of the historic Church Farm and the village's unique sense of place.
St Athan should no longer be thought of as a village but as a small town with infrastructure to meet the growing demands of the population and lacks facilities that are given to surrounding towns such as fire / ambulance and police stations.
If the jobs at the Enterprise Zone (Aston Martin, Bro Tathan) do not match the demographic of the new residents, St Athan simply becomes a "dormitory" village, increasing the carbon footprint as people drive to Cardiff or Bridgend for work. In addition people will travel to St Athan from other areas should they be employed at the new commercial sites.
4. Infrastructure Lag and Healthcare Capacity (Policy CI3)
Under Policy CI3, development should only proceed where adequate community facilities exist or can be provided. Current primary healthcare services in St Athan and nearby Llantwit Major are already oversubscribed. The RLDP provides no "Triggers for Delivery" to ensure that new medical and educational facilities will be operational prior to the occupation of the hundreds of homes planned for the Church Farm site. This creates a significant risk to the wellbeing of both new and existing residents. Access to both village GP services are on a part time basis. With new dentist rules in Wales, this will increase the need for further travel around the area to meet simple check ups. With no A&E facilities in the county St Athan often falls between Cardiff and Bridgend hospitals and continued poor roads together with additional traffic gives greater concern when emergencies happen.
5. Environmental and Biodiversity Impact (Policy SP5)
The Church Farm site consists of high-quality agricultural land and vital greenfield habitats. While Policy SP5 mandates a "Net Benefit for Biodiversity," the total loss of soil permeability and ancient hedgerow connectivity on a site of this scale cannot be mitigated by tokenistic landscaping. Once this valuable land is developed it is irretrievably lost for current and future generations. Currently there are red list species using the space like Yellowhammers and Skylarks. In addition there has been a collapse of invertebrate bio-mass over the last 40 years and personally seen since moving the area in 1980. Net Benefit for Biodiversity plans do not address any of these local and national concerns.
Land to the west of St Athan (SP4.5) This site consists of Grade 2 (Good) or 3a (Excellent) agricultural land. Under Planning Policy Wales (PPW) 12, such land should only be developed if there is an "overriding need" and no lower-grade land is available. The Vale of Glamorgan council has not sufficiently explored brownfield alternatives in the Barry Docks or the St Athan Enterprise Zone. The increased light pollution and "urban glow" will impact the rural character of the Western Vale.
The invertebrate charity Buglife shows that based on citizen science monitoring data, there has been a 75% to 79% decline in the abundance of flying insects in Wales between 2004 and 2023. Natural Resources Wales also reported
• 79% Decrease in Flying Insects (2004–2023): Data from the "Bugs Matter" survey, which counts insect "splats" on vehicle number plates, recorded this 79% reduction in Wales, with 2023 showing further declines from previous years.
• Specific Invertebrate Declines: Moths, which are key pollinators, have seen an average decline of 43% in abundance since 1970.
• Widespread Biodiversity Loss: Welsh wildlife has decreased on average by 20% since 1994, and 18% of species in Wales are at risk of extinction.
• Habitats in Peril: Over the past 50 years, many insects have suffered declines of 65% to 70% in certain areas, particularly moths, butterflies, ladybirds, and ground beetles.
• Impact on Food Chain: Invertebrates that provide food for farmland birds have seen declines of 50-80%.
The cumulative impact of hard-standing surfaces also raises serious concerns regarding surface water runoff into the River Thaw catchment area. Significant surface flooding already

takes place across the western Vale spilling onto roads causing travel disruption.
An increase in hard surfaces also increases ambient temperatures compared to grassland, woodland and other green spaces necessitating increased power use for cooling and comfortable living temperatures. Building practices can help mitigate this but only where this is incorporated into sustainable building rules.
Replacing green fields (which act as a natural sponge) with hundreds of roofs and driveways at Church Farm (SP4.4) and Land West of St Athan (SP4.5) will create a "funnel effect."
Dwr Cymru Welsh Water has previously noted concerns regarding the St Athan Wastewater Treatment Works. Proof is required that the current system can handle the RLDP's projected f
low without increasing overflow events. Further development risks "Combined Sewer Overflows" (CSOs) into local watercourses, which contradicts the Council's Nature Emergency declaration.
The Vale of Glamorgan Council requires a Sustainable Drainage Systems (SuDS) Approval Body (SAB) review. Attenuation ponds are often poorly maintained and can fail during the "1-in 100-year" storm events which are becoming more frequent.
6. Conclusion
The allocation of the above site policies are unsound. It promotes car-dependent growth in a rural location without the necessary infrastructure "trigger points" to protect the local environment or the B4265 road network.
Proposed Remedy: Reduce the housing density at the above sites and re-classify St Athan as a "Minor Rural Settlement" until such time as a dedicated rail link, suitable active travel infrastructure or high-frequency public transport other than rail is fully funded and scheduled for delivery.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3yw

7213 Object

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Mr Andrew Street [3444]

Summary:

The RLDP identifies St Athan as a "Strategic Hub," yet it remains the only primary settlement in the Vale of Glamorgan without a direct rail link. Relying on the "Active Travel" aspirations of Policy SP10 is unrealistic for a community where the majority of residents commute to Cardiff, Bridgend, or Barry.

Full text:

Representation on the Vale of Glamorgan Deposit RLDP 2021–2036

Specific Policy/Site Objection:
• Policy SP4.4: Land at Church Farm, St Athan
• Policy SP4.5: Land to the West of St Athan
• Clive Road (Additional Allocation)
• Policy EMP2: MOD St Athan / Bro Tathan

Status: Unsound

1. Introduction

I wish to formally object to the allocation of the above sites and the broader designation of St Athan as a "Primary Settlement" for high-density growth within the Replacement Local Development Plan (RLDP). This allocation fails the Test of Soundness regarding Consistency (with national climate goals) and Effectiveness (deliverability of infrastructure).

2. Failure of Sustainable Transport (Policy SP7 & SP10)

The RLDP identifies St Athan as a "Strategic Hub," yet it remains the only primary settlement in the Vale of Glamorgan without a direct rail link. Relying on the "Active Travel" aspirations of Policy SP10 is unrealistic for a community where the majority of residents commute to Cardiff, Bridgend, or Barry.

The proposed density at the above sites will inevitably lead to an unsustainable increase in private car journeys on the B4265, specifically at the Gileston Road junction and Weycock Cross, which are already at or near capacity.

Concrete infrastructure is needed to be in place prior to any development of the land. Often intentions of infrastructure are not progressed. In addition where infrastructure is not in place prior to housing many commuters will become accustomed to travel by car and wont switch to public transport. It is difficult to see how developments work with Future Wales: The National Plan 2040

Active travel should look at linking key destinations and with the western vale being spread over longer distances more effort should be given to linking population centres with separated bicycle paths and wide accessible pavements. Shared bike / foot paths are inherently dangerous not allowing the safe use of wheelchairs and prams and sufficient use for children and dog walkers. Cycling should not have to stop at every intersection which creates visibility black spots by the way they turn away from traffic.

With current planned housing and that of additional housing in the LDP creating over 1,000 new homes and with each household having 1-2 cars per household this will add significant additional numbers of journeys on already poor road infrastructure. The vale lacks sufficient north / south routes pushing vehicles towards Weycock Cross in Barry which will have its own traffic issues or via Cowbridge with small country lanes. I personally worked in Cowbridge travelling from St Athan where buses would take over 1 hour 10 minutes and even then not arriving in time to start work. In contrast car travel would be 10 minutes or cycle would be 20 minutes but over dangerous roads.

Travel to Barry for meetings at peak times can take over 50 minutes from St Athan with significant delays leading to Weycock Cross and passed the secondary schools even before developments in the RLDP or existing planning. Public transport gets caught in the same traffic issues.

Access into St Athan is already dangerous from the war memorial with one near fatal accident already having taken place since the ‘improvements’ to the junction. Proposals for additional access from B4265 onto developed land would be on a hill with poor visibility and around a blind bend. Currently there is poor visibility leaving St Athan due to the side by side two car exit blocking views in both directions along with more visibility issues looking westward due to traffic furniture and signage.

While Bro Tathan (Policy EMP2) provides jobs, there is no guarantee that the people moving into local developments will work there. If they commute elsewhere, the RLDP fails its own climate goals (Policy SP1) by creating a "commuter colony" rather than a sustainable community.

Reference Policy CI3 (New Community Facilities). The proposed expansion of St Athan Primary School lacks a guaranteed timeline for when these facilities will be operational relative to house completions. New access to the school under existing planning is only ‘proposed’ and existing access to the school via Rock Road is a poorly surfaced and narrow one way road but is
often ignored with traffic coming via Rectory Drive which has a ‘No entry except for access’ restriction but is not enforced causing large numbers of vehicles into residential areas not built for this type of activity.

Speeding is already a great concern in the village with the current level of vehicle traffic with little compliance with the 20mph speed limit and no enforcement.

3. Coalescence and Loss of Settlement Identity (Policy SSC1)

The scale of development proposed for Church Farm, in conjunction with Policy SP4.5 (Land West of St Athan), threatens the distinct character of the village. The erosion of the "Strategic Gap" between St Athan and Eglwys Brewis violates the principles of Policy SSC1 (Settlement Boundaries). This "urban creep" creates a continuous sprawl that permanently destroys the rural setting of the historic Church Farm and the village’s unique sense of place.

St Athan should no longer be thought of as a village but as a small town with infrastructure to meet the growing demands of the population and lacks facilities that are given to surrounding towns such as fire / ambulance and police stations.

If the jobs at the Enterprise Zone (Aston Martin, Bro Tathan) do not match the demographic of the new residents, St Athan simply becomes a "dormitory" village, increasing the carbon footprint as people drive to Cardiff or Bridgend for work. In addition people will travel to St Athan from other areas should they be employed at the new commercial sites.

4. Infrastructure Lag and Healthcare Capacity (Policy CI3)

Under Policy CI3, development should only proceed where adequate community facilities exist or can be provided. Current primary healthcare services in St Athan and nearby Llantwit Major are already oversubscribed. The RLDP provides no "Triggers for Delivery" to ensure that new medical and educational facilities will be operational prior to the occupation of the hundreds of homes planned for the Church Farm site. This creates a significant risk to the wellbeing of both new and existing residents. Access to both village GP services are on a part time basis. With new dentist rules in Wales, this will increase the need for further travel around the area to meet simple check ups. With no A&E facilities in the county St Athan often falls between Cardiff and Bridgend hospitals and continued poor roads together with additional traffic gives greater
concern when emergencies happen.

5. Environmental and Biodiversity Impact (Policy SP5)

The Church Farm site consists of high-quality agricultural land and vital greenfield habitats. While Policy SP5 mandates a "Net Benefit for Biodiversity," the total loss of soil permeability and ancient hedgerow connectivity on a site of this scale cannot be mitigated by tokenistic landscaping. Once this valuable land is developed it is irretrievably lost for current and future generations. Currently there are red list species using the space like Yellowhammers and Skylarks. In addition there has been a collapse of invertebrate bio-mass over the last 40 years and personally seen since moving the area in 1980. Net Benefit for Biodiversity plans do not address any of these local and national concerns.

Land to the west of St Athan (SP4.5) This site consists of Grade 2 (Good) or 3a (Excellent) agricultural land. Under Planning Policy Wales (PPW) 12, such land should only be developed if there is an "overriding need" and no lower-grade land is available. The Vale of Glamorgan council has not sufficiently explored brownfield alternatives in the Barry Docks or the St Athan Enterprise Zone. The increased light pollution and "urban glow" will impact the rural character of the Western Vale.

The invertebrate charity Buglife shows that based on citizen science monitoring data, there has been a 75% to 79% decline in the abundance of flying insects in Wales between 2004 and 2023.

Natural Resources Wales also reported

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• Specific Invertebrate Declines: Moths, which are key pollinators, have seen an average decline of 43% in abundance since 1970.
• Widespread Biodiversity Loss: Welsh wildlife has decreased on average by 20% since 1994, and 18% of species in Wales are at risk of extinction.
• Habitats in Peril: Over the past 50 years, many insects have suffered declines of 65% to 70% in certain areas, particularly moths, butterflies, ladybirds, and ground beetles.
• Impact on Food Chain: Invertebrates that provide food for farmland birds have seen declines of 50-80%.

The cumulative impact of hard-standing surfaces also raises serious concerns regarding surface water runoff into the River Thaw catchment area. Significant surface flooding already takes place across the western Vale spilling onto roads causing travel disruption.

An increase in hard surfaces also increases ambient temperatures compared to grassland, woodland and other green spaces necessitating increased power use for cooling and comfortable living temperatures. Building practices can help mitigate this but only where this is incorporated into sustainable building rules.

Replacing green fields (which act as a natural sponge) with hundreds of roofs and driveways at Church Farm (SP4.4) and Land West of St Athan (SP4.5) will create a "funnel effect."

Dwr Cymru Welsh Water has previously noted concerns regarding the St Athan Wastewater Treatment Works. Proof is required that the current system can handle the RLDP's projected flow without increasing overflow events. Further development risks "Combined Sewer Overflows" (CSOs) into local watercourses, which contradicts the Council's Nature Emergency declaration.

The Vale of Glamorgan Council requires a Sustainable Drainage Systems (SuDS) Approval Body (SAB) review. Attenuation ponds are often poorly maintained and can fail during the "1-in-100-year" storm events which are becoming more frequent.

6. Conclusion

The allocation of the above site policies are unsound. It promotes car-dependent growth in a rural location without the necessary infrastructure "trigger points" to protect the local environment or the B4265 road network.

Proposed Remedy: Reduce the housing density at the above sites and re-classify St Athan as a "Minor Rural Settlement" until such time as a dedicated rail link, suitable active travel infrastructure or high-frequency public transport other than rail is fully funded and scheduled for delivery.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Redacted Representation Form - https://valeofglamorgan.oc2.uk/a/34q

7230 Support

Document Element: SP1 – SUSTAINABLE GROWTH STRATEGY

Respondent: Dinas Powys Community Council (Dinas Powys Community Council) [2712]

Summary:

Dinas Powys Community Council (DPCC) recognises and welcomes some improvements made in the revised Replacement Local Development Plan (RLDP). These changes demonstrate a more balanced approach to growth and a clearer acknowledgement of environmental and infrastructure constraints across the Vale. DPCC considers the following amendments to be positive and constructive:

3.1 Reduction in Overall Housing Numbers

The reduction in the total housing requirement reflects a more realistic assessment of demographic trends, household formation rates, and deliverability across the plan period. This reduces pressure on constrained settlements such as Dinas Powys.

3.2 Greater Emphasis on Sustainable Locations

The revised RLDP places stronger emphasis on locating development where sustainable transport options exist. This aligns with national policy and reduces reliance on private car travel.

3.3 Strengthened Climate-Change and Flood-Risk Policies

The Council welcomes the enhanced policy framework relating to:

• Climate-change adaptation
• Flood-risk management
• Sustainable drainage (SuDS)
• Nature-based solutions

These changes reflect national guidance and NRW expectations.

3.4 Recognition of Infrastructure Constraints

The revised evidence base acknowledges that certain settlements – including Dinas Powys -face:

• Highway capacity limitations
• Public transport constraints
• Limited school and healthcare capacity

This recognition is essential for sound plan-making.

3.5 Improved Evidence Base

The updated background papers, including the Settlement Sustainability Assessment and the Infrastructure Assessment, provide a clearer picture of constraints and opportunities across the Vale.

Full text:

Dinas Powys Community Council submits this technical objection to the proposed allocation of the Eastbrook site within the Vale of Glamorgan Replacement Local Development Plan (RLDP). While the Council recognises and welcomes several positive changes in the revised RLDP, the Eastbrook allocation remains fundamentally unsound due to unresolved constraints relating to:

• Flood risk and hydrology
• Highways and transport capacity
• Environmental and landscape impact
• Infrastructure limitations
• Deliverability and viability

The Eastbrook site lies within a complex hydrological catchment characterised by:

• Groundwater emergence
• Overland flow routes
• Low-permeability soils
• A history of significant flood events, including the 2020 incident
• Interactions between surface water, groundwater, and existing drainage systems

Natural Resources Wales (NRW) has repeatedly identified flood-risk concerns at this location, and the Council's own evidence base acknowledges the need for detailed catchment-wide modelling before any development can be considered.

The RLDP currently lacks:

• Mandatory policy wording to secure pre-delivery of mitigation
• Requirements for catchment-wide modelling
• Guarantees that development will not increase flood risk elsewhere
• Mechanisms to ensure that mitigation is viable, deliverable, and enforceable

Without these safeguards, the allocation is unsound under the tests of:

• Soundness Test CE2 (coherence and effectiveness)
• Soundness Test CE4 (deliverability)
• Soundness Test CE3 (environmental protection)

This objection sets out:

1. The positive changes recognised in the revised RLDP
2. The continued reasons why the Eastbrook allocation remains unsound
3. A full technical hydrology and flood-risk chapter

4. Mandatory policy wording required to make the allocation sound
5. A formal request for written confirmation from the Vale of Glamorgan Council
6. Supporting diagrams (ASCII + placeholders)

SECTION 1. EXECUTIVE SUMMARY
Dinas Powys Community Council submits this technical objection to the proposed allocation of the Eastbrook site within the Vale of Glamorgan Replacement Local Development Plan (RLDP). While the Council recognises and welcomes several positive changes in the revised RLDP, the Eastbrook allocation remains fundamentally unsound due to unresolved constraints relating to:
• Flood risk and hydrology
• Highways and transport capacity
• Environmental and landscape impact
• Infrastructure limitations
• Deliverability and viability
The Eastbrook site lies within a complex hydrological catchment characterised by:
• Groundwater emergence
• Overland flow routes
• Low-permeability soils
• A history of significant flood events, including the 2020 incident
• Interactions between surface water, groundwater, and existing drainage systems
Natural Resources Wales (NRW) has repeatedly identified flood-risk concerns at this location, and the Council's own evidence base acknowledges the need for detailed catchment-wide modelling before any development can be considered.
The RLDP currently lacks:
• Mandatory policy wording to secure pre-delivery of mitigation
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Without these safeguards, the allocation is unsound under the tests of:
• Soundness Test CE2 (coherence and effectiveness)
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This objection sets out:
1. The positive changes recognised in the revised RLDP
2. The continued reasons why the Eastbrook allocation remains unsound
3. A full technical hydrology and flood-risk chapter
4. Mandatory policy wording required to make the allocation sound
5. A formal request for written confirmation from the Vale of Glamorgan Council
6. Supporting diagrams (ASCII + placeholders)

The Community Council urges the Vale of Glamorgan Council to either:
• Remove the Eastbrook allocation from the RLDP, or
• Incorporate the mandatory policy wording and evidence requirements set out in this document.
Failure to do so will leave the RLDP vulnerable to challenge at Examination.

Examination.

SECTION 2 - INTRODUCTION
Dinas Powys Community Council (DPCC) submits this formal objection to the proposed allocation of the Eastbrook site (HG1 - KS2) within the Vale of Glamorgan Replacement Local Development Plan (RLDP). The Council recognises the importance of delivering sustainable housing across the Vale, and it acknowledges some of the positive changes made in the revised RLDP. However, the Eastbrook allocation remains fundamentally unsound due to unresolved and significant constraints relating to:
• Flood risk and hydrology
• Highways and transport capacity
• Environmental and landscape impact
• Infrastructure limitations
• Deliverability and viability
The Eastbrook site occupies a sensitive position within a complex hydrological catchment. The area is characterised by groundwater emergence, overland flow routes, low-permeability soils, and a history of significant flood events — most notably the 2020 incident, which affected properties downstream. Natural Resources Wales (NRW) has repeatedly highlighted concerns regarding flood risk at this location, and the Council's own evidence base acknowledges the need for detailed catchment-wide modelling before any development can be considered.
Despite these known constraints, the RLDP does not currently include:
• Mandatory policy wording to secure pre-delivery of mitigation
• Requirements for catchment-wide modelling
• Guarantees that development will not increase flood risk elsewhere

• Mechanisms to ensure that mitigation is viable, deliverable, and enforceable
This objection sets out the failure to follow legal Consultation Procedural Soundness, the technical evidence, policy requirements, and mandatory safeguards necessary to make the RLDP sound. Without these safeguards, the allocation fails the tests of soundness, particularly:
• CE2 — Coherence and effectiveness
• CE3 — Environmental protection
• CE4 — Deliverability
This Council therefore requests either:
1. Removal of the Eastbrook allocation from the RLDP, or
2. Inclusion of the mandatory policy wording and evidence requirements set out in this document
Failure to address these issues will leave the RLDP vulnerable to challenge at Examination.

CHANGES IN THE REVISED RLDP
Dinas Powys Community Council (DPCC) recognises and welcomes some improvements made in the revised Replacement Local Development Plan (RLDP). These changes demonstrate a more balanced approach to growth and a clearer acknowledgement of environmental and infrastructure constraints across the Vale. DPCC considers the following amendments to be positive and constructive:
3.1 Reduction in Overall Housing Numbers
The reduction in the total housing requirement reflects a more realistic assessment of demographic trends, household formation rates, and deliverability across the plan period. This reduces pressure on constrained settlements such as Dinas Powys.
3.2 Greater Emphasis on Sustainable Locations
The revised RLDP places stronger emphasis on locating development where sustainable transport options exist. This aligns with national policy and reduces reliance on private car travel.
3.3 Strengthened Climate-Change and Flood-Risk Policies
The Council welcomes the enhanced policy framework relating to:
• Climate-change adaptation
• Flood-risk management
• Sustainable drainage (SuDS)
• Nature-based solutions
These changes reflect national guidance and NRW expectations.
3.4 Recognition of Infrastructure Constraints
The revised evidence base acknowledges that certain settlements – including Dinas Powys -face:
• Highway capacity limitations
• Public transport constraints
• Limited school and healthcare capacity
This recognition is essential for sound plan-making.

3.5 Improved Evidence Base
The updated background papers, including the Settlement Sustainability Assessment and the Infrastructure Assessment, provide a clearer picture of constraints and opportunities across the Vale.

SECTION 4 — CONTINUED OBJECTION TO THE EASTBROOK ALLOCATION
Despite recognising positive changes in the revised RLDP, Dinas Powys Community Council (DPCC) maintains a clear and evidence-based objection to the proposed allocation of the Eastbrook site (HG1 – KS2). DPCC email asked for clarification from the Vale planning office on the fact that the planning policy (dated 17 December 2025) stated 'feedback received has helped to refine proposals for the sites in the deposit plan'. When asked at the consultation at Murchfield what the refinements were, the response was 'there has not been any'.
The allocation remains unsound because the fundamental constraints affecting the site have not been resolved, mitigated, or fully understood.
DPCC's objection is based on the following core issues:
4.1 Flood Risk and Hydrology
The Eastbrook site sits within a complex and sensitive hydrological catchment. Key concerns include:
• Groundwater emergence during prolonged wet periods
• Overland flow routes that cross the site and discharge toward existing residential areas
• Low-permeability soils that limit infiltration
• A history of significant flood events, including the 2020 incident
• Interactions between surface water, groundwater, and existing drainage systems
NRW has repeatedly raised concerns about flood risk at this location. The Council's own evidence base acknowledges that catchment-wide modelling is required before any development can be considered. This modelling has not been undertaken.
4.2 Highways and Transport Capacity
Dinas Powys already experiences:
• Congestion on Cardiff Road
• Limited capacity at key junctions
• Insufficient public transport frequency
• High dependency on private car travel
The Eastbrook allocation would exacerbate these issues. No deliverable or funded mitigation has been identified.

4.3 Environmental and Landscape Impact
The site contributes to:
• Local landscape character
• Biodiversity connectivity
• Air quality
• Green infrastructure
• Natural drainage functions
Development would result in the loss of greenfield land that currently performs essential hydrological and ecological roles.
4.4 Infrastructure Limitations
Local infrastructure is already under pressure, including:
• Schools
• Healthcare provision
• Utilities
• Surface-water drainage systems
No evidence has been provided to demonstrate that these constraints can be resolved within the plan period.
4.5 Deliverability and Viability
The RLDP does not demonstrate that:
• Required flood-risk mitigation is technically feasible
• Mitigation is financially viable
• Mitigation can be delivered before development
• Mitigation will not increase flood risk elsewhere
Without this evidence, the allocation fails Soundness Test CE4 (deliverability).
Finally, there are questionable processes in the Consultation procedure that DPCC would like to question. These include:
Lack of Formalised Documentation and Transparent Feedback Loops: The consultation process currently lacks procedural transparency, specifically regarding the recording of public participation and the subsequent analysis of feedback. There is no evidence of formalised record-keeping for public attendance at engagement events, nor a transparent ledger of how individual resident comments were synthesised into the current Plan. Without clear feedback loops, it remains entirely unclear to stakeholders how local consultation responses have influenced site allocation decisions, compromising the Plan's legitimacy and accountability.
Significant Digital Barriers and Technical Complexity: The Council's primary reliance on an "online-first" engagement strategy, through its consultation portal, has created substantial barriers to participation. The technical reports and modelling assumptions provided are often not easily interpretable by laypersons, limiting the ability of the community to effectively scrutinise the evidence base. The complexity of the account-creation process and the technical nature of the guidance notes have resulted in a disproportionate administrative burden that discourages meaningful public response.
Digital Exclusion and Demographic Disparity: The current consultation framework fails to adhere to the requirement that engagement must be "inclusive and accessible to all local groups", particularly those less likely to participate. Residents in Dinas Powys, specifically non-digitally native demographics and the elderly, face significant digital exclusion due to the lack of accessible summaries and the high level of technical literacy required to complete online forms. This lack of equitable access undermines the Council's duty to ensure a robust and representative evidence base.
Inflexible Scheduling and Inequitable Engagement Windows: The timing of the consultation periods has been identified as a factor that alienated or excluded significant portions of the local community. Despite formal requests from the DPCC for more accessible scheduling to facilitate wider public attendance, these requests were refused. Furthermore, there is a perceived pre-determination in the process, where preferred strategies and site directions appear to be announced prior to effectively engaging public opinion, rendering the subsequent consultation window a mere formality rather than a meaningful opportunity for influence.
Conclusion on Soundness: Due to these systemic failures in the Plan-making process, the RLDP fails the test of Effectiveness (CE2). Until the Council can demonstrate a fully transparent, accessible, and documented consultation process that genuinely reflects the lived experience of the community, the Plan cannot be considered fully justified or consistent with national policy regarding community involvement.
SECTION 5 — TRANSPORT AND HIGHWAYS

CONSTRAINTS

Transport and highways capacity remain a critical constraint for Dinas Powys and a central reason why the Eastbrook allocation is unsound. The settlement already experiences significant congestion with increasing air pollution (around critical areas such as schools), limited public transport provision, and constrained junction capacity. The RLDP does not demonstrate that these issues can be resolved within the plan period, nor does it provide evidence that the Eastbrook allocation can be delivered without exacerbating existing problems.

5.1 Existing Congestion and Network Stress

Dinas Powys suffers from chronic congestion, particularly along:

Cardiff Road The approach to the Merrie Harrier junction The route toward Penarth The route toward Barry

Peak-time delays are well-documented, and queueing frequently extends through residential areas. The network operates close to or at capacity during peak hours, leaving little room for additional traffic generated by new

development.

5.2 Limited Public Transport Provision

Public transport options are constrained by:

Infrequent bus services Limited rail capacity at Eastbrook Station Poor integration between modes Lack of reliable alternatives to private car travel

The RLDP does not identify any committed or funded improvements that would materially increase public transport capacity.

5.3 Junction Capacity Constraints

Key junctions in and around Dinas Powys are already operating at or near capacity. These include:

Merrie Harrier junction Cardiff Road / Penlan Road Cardiff Road / Millbrook Road

No evidence has been provided to demonstrate that these junctions can accommodate additional traffic from the Eastbrook allocation.

5.4 Lack of Deliverable Mitigation

The RLDP does not include:

Funded highway improvements Committed public transport enhancements A deliverable transport strategy for Dinas Powys Evidence that mitigation is viable or achievable within the plan period

Without deliverable mitigation, the allocation fails Soundness Test CE4 (deliverability).

5.5 Cumulative Impact

The cumulative impact of, existing congestion, committed developments, background traffic growth and the Eastbrook allocation has not been assessed in a robust or comprehensive manner.

a. Unresolved Chronic Congestion on the A4055 Corridor:

The RLDP fails to demonstrate that the primary highway network serving Dinas Powys can accommodate the proposed level of growth without resulting in unacceptable congestion.

Existing Network Stress: The A4055 (Cardiff Road) and the approach to the Merrie Harrier junction are already characterized by "chronic congestion". Peak-time delays are well-documented, with queuing frequently extending through residential areas as the network operates at or near capacity.

Absence of Modelling: The Plan lacks transparent, settlement-specific junction capacity assessments or peak-hour traffic modelling for these key constraints. Without this evidence, the Council's assumption that an additional 250 units can be absorbed is technically unjustified.

The RLDP Preferred strategy requires the developer to provide "improvements to infrastructure, including the upgrading of highways. and utility networks" and provide "on and off-site measures" to provide safe linkages to Eastbrook Station and "upgrading of highways". It is unclear what if any specific and definitive instruction will be given to the developer and how the Council will monitor and ensure that appropriate objectives are achieved.

VOG Highways say that Persimmon cannot pencil in the 'secondary' or emergency access. Persimmon failed to do a traffic study to contest Highways' view. Another is no proposal to bring pedestrian/cycle access up to the Welsh Government standard. The suggested George's Row and Seel Park routes to Eastbrook Station and Camms Corner shopping area do not work. Highways point out this is a Welsh Government requirement for new developments.

In reference to Welsh Government's policies;

Policy conflict Fails PPW11 TAN 18, and the Fire and Rescue Services Act duty to maintain effective response capability. The proposal's reliance on a single access for a development of 250 dwellings is;

Contrary to PPW11 (safe, resilient access) Contrary to Tan 18 (avoid single points of failure) Contrary to Fire and Rescue operational requirements in Wales Contrary to Manual for Streets principles Contrary to established Welsh LHA practice Unsupported by appeal precedent.

The development therefore presents an unacceptable and avoidable risk to residents and emergency responders. A

second access, or at minimum a fully engineered emergency only route, is essential to make the scheme safe and policy compliant.

b. Cumulative Traffic Flows from Regional RLDP Growth:

The RLDP directs a significant portion of the 7,890 required dwellings to settlements east of Dinas Powys, including major allocations in Barry and Penarth.

Impact of Neighbouring Allocations: Developments such as Upper Cosmeston Farm in Penarth (576 units) and the proposed growth in Barry (686 units) will significantly increase commuter volumes along the A4055, which serves as the primary arterial route to Cardiff.

Commuter Dependency: Data identifies Cardiff as the destination for 63.6% of all commuters from the Vale traveling by car. The RLDP fails to robustly assess the cumulative impact of background traffic growth, committed developments, and the Eastbrook allocation on the Dinas Powys road network. The Eastbrook allocation is fundamentally car-dependent due to infrequent bus services and limited modal integration. Furthermore, the RLDP does not identify any funded or committed highway improvements for the A4055 (Cardiff Road) or the Merrie Harrier junction, both of which are already operating at or near capacity. This lack of deliverable mitigation contradicts the transport objectives.

c. Failure of Active Travel and Pedestrian Infrastructure: The Plan relies on "sustainable transport options" to justify the Eastbrook site, yet the physical infrastructure is fundamentally non-compliant with inclusive design standards: Pavement Capacity and Safety: Existing pedestrian routes connecting the site to the village centre, are insufficient in width to accommodate double buggies or wheelchairs. These routes are further obstructed weekly by refuse collection and recycling bags, forcing vulnerable pedestrians - including those with single buggies or small children - to navigate restricted and unsafe spaces.

During the consultation (6th February 2026) Vale officers were asked if they had walked the proposed active travel route along Cardiff Road. We were told they had not. Photos below show how narrow the pavement is and this does not meet with the Active Travel Guidelines. There is no capacity to widen this route. In addition, the other proposed route via Powys Gardens involves a very steep hill. Would this be accessible for people with mobility scooters or mobility issues. It would also be a hazard in icy weather. This route also incorporates an alleyway which is not visible from start to finish with a 90 degree angle and no lighting. This is a safety concern. Another route is via some garages which are off George's Row. This is not and adopted road by the Vale and therefore not within their remit to propose it as an active travel route.

Eastbrook Railway Station Accessibility: While the station is within a 10-minute walk, it suffers from a critical "accessibility gap." Only one platform is accessible to residents with limited mobility, prams, or cycles. Due to the absence of a lift to the opposite platform, these residents must undertake a one-mile detour via local roads to access rail services, rendering the "sustainable" rail link effectively inaccessible to a significant portion of the demographic. Feedback from the Vale drop in session (6th February 2026), revealed that when residents mentioned that mothers with prams and people with mobility issues can't use the Eastbrook station, The response was 'it's fine for the majority'. When asked about the minority and about them being discriminated against there was no response. When looking at Active Travel Guidelines it references the Equality Act 2010. What dialogue has the Vale had with organisations representing people with protected characteristics.
d. Deficiencies in Public Transport Provision: The reliance on "good bus links" is not supported by current service levels:

Infrequent Bus Services: Dinas Powys is characterized by infrequent bus services that do not provide a reliable alternative to private car travel.

Lack of Mitigation: The RLDP does not identify any committed or funded improvements to bus frequency or capacity, ensuring that the Eastbrook development will remain car- dependent and exacerbate existing A4055 corridor failures. Without a committed and funded scheme to address the documented "chronic congestion" at the Merrie Harrier junction and A4055, the allocation fails the deliverability standards outlined in the RLDP Section 7.8.

Mandatory Policy Wording Required for Soundness: to address these obstacles and ensure they are not sidelined during the development process, the RLDP must include the following:

Enforceable policy wording to meet Soundness Tests CE2 (Effectiveness) and CE4 (Deliverability): Policy TR-DNP: Enforceable Transport and Accessibility Mitigation

Development at Eastbrook (HG1 - KS2), in the opinion of DPCC, should not be permitted unless the following criteria are met and delivered in advance of occupation:

1. Corridor Capacity and Cumulative Modelling: A comprehensive Cumulative Transport Assessment is completed and approved, demonstrating that the A4055 and Merrie Harrier junction can accommodate traffic from Eastbrook in combination with committed growth in Barry and Penarth without exceeding statutory capacity or safety limits. During the consultation Vale officers admitted that the road is already over capacity.

2. Eastbrook Station Bilateral Access: Legally binding funding and a delivery program are secured for the installation of a lift or accessible bridge at Eastbrook Railway Station to ensure bilateral platform access for all users, removing the current one-mile detour requirement.

However, having been in discussion with the Department of Transport, they have no plans to make any improvements to the station with regard to access.

3. Statutory Inclusive Pedestrian Widths: All off-site pedestrian linkages to the village centre and station are widened to meet statutory inclusive design standards, ensuring a minimum effective width for simultaneous passage of double buggies and wheelchairs. In line with the Active Travel Act has the Vale carried out an Equality impact assessment (EQIAs). Proposed active travel routes do not meet the criteria.

4. Operational Access Management: A Pedestrian Management Plan is approved, demonstrating how safe passage for prams and wheelchairs will be maintained during weekly refuse and recycling collections.

5. Secured Bus Enhancements: Written confirmation and funding are secured to increase bus service frequency to provide a genuine, high-frequency alternative to private car travel for Cardiff-bound commuters. Has a WelTAG survey has been carried out? Due to the volume of traffic through Dinas Powys a bus service is thinking of reducing the service as so much time is spent in static traffic. Evidence that these routes can be preserved or managed safely including evidence of Equality Impact Assessment (EQIAs). Evidence of the Active Travel Wales Act 2013. What reasonable measures have you taken to include children and young people in the planning and implementation and review of the decision-making process? Conclusion: In the absence of this 'mandatory wording' and the required 'technical modelling', the Eastbrook allocation is unsound. It ignores the physical reality of the infrastructure, the lived experience of residents on the A4055, and the cumulative traffic pressures generated by the RLDP's own regional growth strategy. Based on a review of the Vale of Glamorgan RLDP Preferred Strategy and the Final Review Report, the following technical objection focuses on the proposed delivery of 250 houses at the Eastbrook site. This objection highlights the failure to align the housing mix with local demographic needs, the lack of transparency regarding infrastructure funding, and the questionable justification for further large-scale growth in Dinas Powys. 5.6 Summary

The transport and highways evidence base does not demonstrate that the Eastbrook allocation can be delivered without causing severe impacts on the local network. The RLDP therefore fails to meet the requirements of national planning policy, which requires development to be located where sustainable transport options exist and where the impact on the transport network can be effectively mitigated.

SECTION 6 — ENVIRONMENTAL AND LANDSCAPE IMPACT

The Eastbrook allocation sits within a sensitive landscape setting that performs important ecological, visual, and hydrological functions. Development of this site would result in the permanent loss of greenfield land that currently contributes to the environmental quality and character of Dinas Powys. The RLDP does not demonstrate that these impacts can be acceptably mitigated.

6.1 Landscape Character and Visual Impact

The site forms part of the green corridor that separates Eastbrook from adjoining areas. It contributes to:

The semi-rural character of the settlement edge Views from public rights of way The visual transition between built form and open countryside The sense of openness and separation between neighbourhoods

Development would introduce built form into an area that currently provides visual relief and contributes to local identity.

6.2 Biodiversity and Habitat Connectivity

The site supports:

Hedgerows Grassland habitats Mature trees Wildlife corridors connecting to wider green infrastructure

These features provide habitat for a range of species and contribute to ecological connectivity across the settlement. Development would fragment these habitats and reduce biodiversity value.

6.3 Green Infrastructure Functions

The land performs several important green-infrastructure functions, including:

Natural drainage and infiltration Groundwater recharge Overland flow conveyance Urban cooling Carbon sequestration

These functions are particularly important given the site's hydrological sensitivity.

6.4 Impact on Local Amenity

The site provides informal amenity value for local residents, including:

Views Open space character A sense of separation between built areas

Development would reduce these qualities and alter the character of the local environment.

6.5 Lack of Robust Mitigation Evidence

The RLDP does not provide:

A landscape and visual impact assessment A biodiversity net-gain strategy A green-infrastructure plan Evidence that ecological impacts can be mitigated or compensated A clear demonstration that the site can deliver net environmental benefits

Without this evidence, the allocation fails Soundness Test CE3 (environmental protection).

Statutory Ecological and Environmental Impacts: The development will cause detrimental impacts on protected European sites and irreplaceable local habitats like Ancient Woodland.

Independent Source Verification:

The HRA of the Preferred Strategy (2023) explicitly flags Site 440 (HG1 - KS2 Land North of Dinas Powys) as being only 2.6km from the Severn Estuary SAC/SPA/Ramsar.

The HRA concludes that "Mitigation is Required" for this site because it falls within the core recreational catchment of the Estuary. It recommends that the RLDP must contribute to Strategic Access Management and Monitoring (SAMM) and the provision of alternative green spaces (SANG) to protect the integrity of the Estuary.

NRW's ECOR documents that previous attempts to build flood storage in the area were opposed by the Woodland Trust because they would threaten Ancient Woodland, which is described as an "irreplaceable natural resource".

Prematurity regarding Green Infrastructure (Policy SP10 / MG18): Section 7.10 of the Review Report mandates a new Green Infrastructure Assessment (GIA) to comply with updated national policy (PPW) and the Section 6 duty to enhance biodiversity.

Grounds for Objection: The Review Report highlights that this GIA is intended to "inform plan policies and policy wording". Furthermore, independent evidence confirms the Eastbrook area is subject to Policy MG18 (Green Wedge), where development that prejudices the "open nature of the land" is prohibited. Allocating Eastbrook before the completion of the settlement-specific GIA and a formal review of the Green Wedge's integrity contradicts the sequential approach described in Section 7.

To prevent irreversible damage to the environment and ensure the ecological integrity of Dinas Powys, the RLDP must move beyond high-level assumptions. Based on the evidence in the sources, the following measures are strictly necessary to protect the local and regional environment from the impacts of the proposed Eastbrook development:

1. Mandatory Hydrological Safeguards: The Eastbrook site sits within a complex catchment characterized by groundwater emergence and low-permeability soils. To prevent increased flood risk to the environment and existing properties, the following must be delivered:

Catchment-Wide Hydraulic Modelling: A full model, agreed with Natural Resources Wales (NRW), must be completed to assess surface water, groundwater, and overland flow. This model must specifically incorporate data from the 2020 flood event to demonstrate "no increase in flood risk" to any property within the catchment.

Preservation of Natural Drainage: Existing overland flow routes and groundwater pathways must be preserved, enhanced, or appropriately managed to prevent the displacement of water into sensitive habitats or residential areas.

Proven SuDS Feasibility: A detailed study is required to prove that Sustainable Drainage Systems (SuDS) can operate effectively given the site's documented high groundwater levels and limited infiltration capacity.

2. Protection of Irreplaceable Habitats: The development area includes and is adjacent to Ancient Woodland and Sites of Importance for Nature Conservation (SINC), such as Coed Clwyd-Gwyn and Case Hill Wood.

Avoidance of Loss: Ancient woodland is an "irreplaceable natural resource". To prevent environmental damage, the Council must demonstrate that development will not result in its loss or deterioration, as "no amount of tree planting" can replace the unique biodiversity and interactions developed over centuries in these woods.

Connectivity and Resilience: The Plan must secure a Green Infrastructure Plan that maintains wildlife corridors and

prevents the fragmentation of habitats for protected species, including bats, otters, and dormice.

Hydrological Stability: Measures must ensure that the development does not cause nutrient enrichment or pollution of woodland soils via sediment-heavy floodwaters, which can destabilize trees and kill overwintering species.

3. Mitigation for European Protected Sites: The Habitats Regulations Assessment (HRA) confirms that the Eastbrook site (Site 440 - HG1 - KS2) has "medium-high suitability" as off-site supporting habitat for the Severn Estuary SPA/Ramsar. To prevent an adverse effect on the integrity of this site, the following is necessary:

Bird Surveys and Evidence: The applicant must provide non-breeding bird surveys covering autumn, winter, and spring to determine if the site constitutes "functionally linked habitat" (supporting >1% of a qualifying population). Enforceable Mitigation: If significant populations are identified, the development must include avoidance measures and be assessed through a project-specific HRA.
4. Air Quality and Carbon Mitigation: Dinas Powys suffers from chronic congestion on the A4055, yet location-specific air quality modelling is absent from the evidence base. Cumulative Impact Modelling: To prevent harm to human health and the environment, the Council must conduct detailed air quality modelling that tests the cumulative effect of growth in Eastbrook alongside regional growth in Barry and Penarth. Decarbonisation Standards: New development must contribute to the Council's Net Zero 2030 ambition through siting and design that prioritizes active travel over car dependency, thereby reducing vehicle emissions.
5. Infrastructure Pre-Delivery: To prevent environmental harm from overloaded systems, essential infrastructure must be phased correctly: Wastewater Capacity: A settlement-specific assessment must prove the consented capacity of local wastewater treatment works is sufficient to prevent sewer surcharging and the discharge of untreated water into local watercourses. Phasing Requirements: All required infrastructure upgrades-including drainage, utilities, and highways mitigation-must be delivered and operational in advance of occupation. Conclusion: Without these mandatory policy safeguards and the completion of the required technical evidence base, the Eastbrook allocation remains unsound and poses a significant risk of irreparable damage to the environment of Dinas Powys.

SECTION 7 — INFRASTRUCTURE CAPACITY AND SERVICE LIMITATIONS

Infrastructure capacity is a critical determinant of whether a site is suitable and deliverable within the RLDP period. In the case of Eastbrook, the evidence demonstrates that essential infrastructure in Dinas Powys is already under significant pressure. The RLDP does not provide clear, funded, or deliverable solutions to these constraints, nor does it demonstrate that the Eastbrook allocation can be supported without unacceptable impacts on existing residents.

7.1 Education Capacity

Local schools are operating at or near capacity. Key issues include:

Limited availability of primary school places Pressure on secondary school capacity within the wider catchment. No identified funding or land for expansion No evidence that developer contributions would be sufficient or timely

The RLDP does not demonstrate that additional demand generated by the Eastbrook allocation can be accommodated.

Education Provision and School Oversubscription: The RLDP identifies Dinas Powys as a sustainable location for growth, yet it fails to provide settlement-specific evidence that local schools can absorb the additional demand from 250 new homes.

Capacity Deficit: Local primary and secondary schools are already operating at or near peak capacity. Existing data indicates limited availability of primary school places and significant pressure on secondary school capacity within the wider catchment area.

Lack of Expansion Capability: There is no identified land or secured funding for the physical expansion of these schools. The Plan provides no evidence that developer contributions (Section 106) would be sufficient or timely enough to resolve these standard-of-service deficits prior to the occupation of new homes.

Policy Inconsistency: Proceeding with the allocation without a confirmed delivery plan for school places is contrary to Planning Policy Wales, which requires growth to be directed only where essential infrastructure is available or can be secured.

To ensure that education capacity is not "overridden" by strategic regional data, the following enforceable requirement should be incorporated into Policy SP4 KS2: Policy ED-DNP: Mandatory Local Education Capacity Confirmation "Development at Eastbrook will not be permitted unless:

1. Direct Local School Consultation: A formal School Capacity Impact Report is submitted, based on direct consultation with the Headteachers and Governing Bodies of the specific schools within the Dinas Powys catchment area.

2. Verified Local Headroom: The report must provide written confirmation from these local institutions that they have the physical classroom space and staff capacity to accommodate the projected pupil yield from the development without

increasing class sizes beyond statutory limits or compromising educational standards.

3. Local vs. Authority Primacy: High-level strategic projections from the Education Authority shall be deemed insufficient evidence of deliverability if they are contradicted by the operational data and physical constraints identified by the local schools themselves.

4. Pre-commencement Delivery: Any required physical expansions or new school infrastructure must be fully funded, completed, and operational prior to the occupation of the first dwelling to ensure places are available when needed

7.2 Healthcare Provision

Healthcare services in Dinas Powys and the surrounding area face:

Limited GP medical centre capacity Long waiting times Pressure on community health services No committed investment to expand provision

The medical services serving Dinas Powys are currently at capacity, and the RLDP fails to identify a mechanism to expand provision in line with population growth. Whilst it's understood that the Vale Council have spoken with the local health board. Unfortunately, there has been no consultation with single medical centre in Dinas Powys. They would be best placed to comment on the significant impact of additional housing on their provision of healthcare which is already stretched well beyond its limits.

GP and Dental Strain: Local residents already experience limited medical GP capacity and long waiting times. Existing community health services are under "significant pressure," and there is no committed investment to expand these facilities across Dinas Powys.

Lack of Local Consultation: While the Council claims to work at a high level with the Cardiff and Vale University Health Board, there has been no direct consultation with the local Health Centre serving Dinas Powys. Consequently, the Plan does not account for the technical and operational realities of a surgery that is already at capacity and cannot absorb the projected increase in patient numbers. A direct operational capacity verification from the Dinas Powys Medical Centre - current patient list size is around 11k which has increased significantly due to the closure of a nearby practice and therefore the practice is experiencing a reduced operational capacity. Any additional housing would put further strain on the practice demands and waiting times for local residents and would mean the practice moves further outside the idealised UK average (1 GP per 1,400-1,600 patients).

Health Inequality Risk: Without settlement-specific planning and confirmed provision, the proposed growth risks reducing access to healthcare for both existing and new residents, directly undermining the health and well-being objectives set out in Policy SP6.

7.3 Utilities and Drainage

Utility networks in the area face known constraints:

Surface-water drainage systems are already under pressure Foul drainage capacity is limited Welsh Water has previously raised concerns about network capacity in the settlement No evidence has been provided to demonstrate that upgrades are deliverable within the plan period

Given the site's hydrological sensitivity, drainage capacity is a critical issue.

7.4 Emergency Services and Community Infrastructure

The Eastbrook allocation would place additional pressure on:

Emergency services Community facilities Local open space Recreational infrastructure

No evidence has been provided to demonstrate that these services can absorb additional demand.

7.5 Funding and Deliverability

The RLDP does not identify:

Committed funding a delivery programme a mechanism to secure timely infrastructure upgrades Evidence that developer contributions would be viable or sufficient

Without this, the allocation fails Soundness Test CE4 (deliverability).

7.6 Summary

Reference Environment and Regeneration Scrutiny Committee 14 January 2025 it states. 'Produce sustainable Urban Drainage Solutions'. No progress due to funding and competing priorities. Infrastructure in Dinas Powys is already excessively stretched. The RLDP does not demonstrate that the Eastbrook allocation can be supported without a significant adverse impact on existing residents. Nor does it provide evidence that required upgrades are viable, deliverable, or fundable within the plan period.

SECTION 8 — HYDROLOGY AND FLOOD-RISK ANALYSIS (FULL TECHNICAL CHAPTER)

The Eastbrook site lies within a hydrologically sensitive catchment characterised by complex interactions between surface water, groundwater, overland flow, and existing drainage infrastructure. The site has a documented history of flooding, including the significant 2020 event, and Natural Resources Wales (NRW) has repeatedly raised concerns about the potential for development to increase flood risk elsewhere. At the Vale Council's drop-in session (6th Feb), there was a lack of knowledge that there is a Holy Well on the Eastbrook site, referenced in the NRW report on flooding (NRW Dinas Powys Flood Risk Management Scheme OBC page 10).

This section provides a technical assessment of the hydrological constraints affecting the site and sets out the evidence required to ensure that any development does not exacerbate flood risk to existing properties.
8.1 Catchment Overview
The Eastbrook site forms part of a small but highly responsive catchment. Key characteristics include: Low-permeability soils, resulting in rapid surface-water runoff Groundwater emergence during prolonged wet periods Overland flow routes crossing the site and discharging toward existing residential areas Limited infiltration capacity, reducing the effectiveness of SuDS Downstream constraints within the existing drainage network The catchment responds quickly to rainfall, with limited storage capacity and a high risk of exceedance during intense or prolonged events.

8.2 Hydrological Function of the Site

The site currently performs several important hydrological functions:

Attenuation of surface water during storm events Conveyance of overland flow along natural depressions Groundwater emergence and dissipation Reduction of peak flows entering downstream drainage systems Natural infiltration, albeit limited by soil type

Development would significantly alter these functions, increasing runoff rates and volumes unless substantial mitigation is provided.

8.3 Overland Flow Routes

Multiple overland flow routes cross the site. These routes convey water:

From higher ground to the north and east Across the site during heavy rainfall Toward existing residential areas downstream

Below is an ASCII-style conceptual diagram illustrating the simplified flow pattern:

Code [Higher Ground]

V

Overland Flow Across Site

V [Existing Residential Area] (Downstream Flood Receptors)

Diagrammatic representation for illustrative purposes only - not to scale.

These routes are active during moderate and heavy rainfall events and were observed during the 2020 flood incident.

8.4 Groundwater Emergence

Groundwater emergence has been recorded on and around the site during:

Prolonged wet periods High antecedent moisture conditions Winter months

This groundwater emergence contributes to:

Saturated ground conditions Reduced infiltration capacity Increased surface-water runoff Localised flooding

Any development must demonstrate that it will not alter groundwater pathways or increase groundwater-related flood risk.

8.5 The 2020 Flood Event

The 2020 flood event provides clear evidence of the site's hydrological sensitivity. During this event:

Overland flow crossed the site Groundwater emergence contributed to saturated conditions Downstream properties experienced flooding Existing drainage systems were overwhelmed

The event demonstrated that:

The catchment is highly responsive The site plays a critical role in attenuating and conveying water Development could increase flood risk unless carefully managed

The RLDP does not include any analysis of the 2020 event, nor does it require developers to assess its implications.

8.6 NRW Position and Evidence Requirements

NRW has consistently raised concerns about:

Surface-water flood risk Groundwater interactions Overland flow routes Downstream flood receptors Lack of catchment-wide modelling

NRW has advised that catchment-wide hydraulic modelling is required to:

Understand baseline conditions Assess the impact of development Identify necessary mitigation Ensure no increase in flood risk elsewhere

This modelling has NOT been undertaken.

The RLDP flood risk evidence base is functionally obsolete. It relies on the 2013 Local Flood Risk Management Strategy and a September 2020 NRW decision to abandon capital mitigation. Both of these were rendered technically invalid by the scale of the December 2020 flood event. NRW has not formally reviewed or updated a mitigation strategy for this catchment in the 11 years since the original LFRMS was published. NRW's last formal review of flood mitigation for this area was the September 2020 ECOR, which predates the 2020 flood. No post-flood mitigation review or catchment modelling incorporating the 2020 data has been undertaken.

8.7 Limitations of SuDS on This Site

While SuDS are a national requirement, their effectiveness on this site is constrained by:

Low-permeability soils High groundwater levels Limited infiltration potential Steep localised gradients Overland flow pathways that cannot be obstructed

SuDS alone cannot mitigate the hydrological impacts of development without:

Catchment-wide modelling Detailed design Pre-delivery of mitigation Long-term maintenance arrangements

8.8 Required Mitigation Measures

To ensure no increase in flood risk, the following mitigation measures would be required:

Catchment-wide hydraulic modelling Preservation of overland flow routes On-site attenuation with exceedance routing Groundwater management measures Upgrades to downstream drainage systems Pre-delivery of mitigation before development commences

The RLDP does not secure any of these measures.

8.9 Summary

The Eastbrook site is hydrologically complex and highly sensitive. Without detailed catchment-wide modelling and enforceable mitigation, development would increase flood risk to existing properties. The RLDP does not provide the evidence or policy framework required to ensure that the allocation is sound.

Natural Resources Wales (NRW) has not formally reviewed or updated its flood mitigation plans for Dinas Powys since the major flood event on December 23, 2020. The evidence base reveals a critical gap between the last strategic planning and the reality of the 2020 disaster:

1. The "2013 Strategy" Precedent: The Local Flood Risk Management Strategy (LFRMS) for the Vale of Glamorgan is

dated December 2013. While this document identified Dinas Powys as being at "significant future risk," it is now over a decade old and predates both the 2020 flood and updated climate change projections. Reference Environment and Regeneration Scrutiny Committee 14 January 2025 it states. 'Implement a flood risk management plan and shoreline management plan'. No progress due to funding and competing priorities.

The above shows that the concerns of residents and flood issues in Dinas Powys are not being taken seriously.

2. Pre-Flood Rejection of Mitigation (September 2020): The most recent formal NRW assessment regarding a strategic flood scheme for Dinas Powys - the Environmental Constraints and Opportunities Record (ECOR) - was completed in September 2020, just three months before the major flood event.

A "Walkaway" Conclusion: In that pre-flood report, NRW concluded it was "unable to justify a capital flood scheme" for Dinas Powys because it was deemed only "marginally cost-beneficial".

Status Quo: NRW stated they would continue only with "business as usual" (manual channel clearing) rather than any new structural mitigation.

3. No Post-Flood Review of Mitigation: While NRW conducted "flood reconnaissance" in January 2021 and contributed to the Section 19 Flood Investigation Report (published in November 2021), these were investigative documents rather than updated mitigation plans. Missing Evidence Base: The sources explicitly state that "no catchment-wide hydraulic modelling has been undertaken" that incorporates the actual data and observations from the December 2020 event.

Outstanding Recommendations: The Section 19 report concluded by recommending that NRW "consider the viability of options to reduce flood risk," which confirms that such a review had not yet taken place as of late 2021.

4. RLDP Soundness Failure: The current RLDP is being challenged because it relies on high- level strategic data that ignores the 2020 flood event entirely.

The objection drafts note that the RLDP "does not include any analysis of the 2020 event" nor does it require developers to assess its implications.

Without an NRW-approved model that accounts for the 98 internal property floodings observed in 2020, the Council cannot technically prove that 250 additional houses will not increase flood risk elsewhere.

In conclusion, in this respect, the RLDP is unsound because its flood evidence base is functionally obsolete. It relies on a 2013 Strategy and a September 2020 NRW decision to abandon mitigation-both of which were rendered invalid by the scale of the December 2020 flood. NRW has not reviewed or modelled a new mitigation strategy for the catchment since that event occurred, leaving the settlement and the proposed site without any verified protection.

SECTION 9 — MANDATORY POLICY WORDING REQUIRED TO MAKE THE RLDP SOUND

To ensure that the Eastbrook allocation is sound, the RLDP must include explicit, enforceable, and unambiguous policy wording that secures the necessary hydrological, environmental, and infrastructure safeguards. Without this wording, the allocation fails the tests of soundness - particularly CE2 (coherence and effectiveness), CE3 (environmental protection), and CE4 (deliverability).

The following policy wording is mandatory to ensure that development does not increase flood risk elsewhere and that mitigation is viable, deliverable, and enforceable.

9.1 Mandatory Flood-Risk Policy Wording

The RLDP must include the following:

Policy FR-X: Catchment-Wide Flood-Risk Assessment (Mandatory Requirement) Development at Eastbrook (HG1 - KS2) will not be permitted unless:

1. A full catchment-wide hydraulic model has been prepared, agreed with Natural Resources Wales (NRW), and approved by the Local Planning Authority (LPA). 2. The model demonstrates no increase in flood risk to any existing property within the catchment for all relevant storm events, including climate-change allowances. 3. All required mitigation measures are: Technically feasible Financially viable Deliverable within the plan period Secured through planning conditions or legal agreement 4. All mitigation measures are delivered prior to the commencement of development. 5. Overland flow routes, groundwater pathways, and natural drainage functions are preserved, enhanced, or appropriately managed. 6. A long-term management and maintenance plan for all SuDS and flood-risk infrastructure is secured.

9.2 Mandatory Groundwater and Overland Flow Policy Wording Policy FR-Y: Groundwater and Overland Flow Protection Development proposals must:

Demonstrate that groundwater emergence will not be exacerbated Preserve all existing overland flow routes Provide

exceedance routing that avoids existing residential areas Incorporate groundwater-resilient design measures Avoid any obstruction of natural drainage pathways

No development will be permitted unless these requirements are met in full.

9.3 Mandatory SuDS Policy Wording

Policy SuDS-X: Sustainable Drainage Requirements

All development must:

Provide SuDS designed in accordance with national standards Demonstrate that infiltration-based SuDS are viable, or provide alternatives where infiltration is not feasible Include attenuation sized using catchment-wide modelling outputs Provide exceedance routing that avoids downstream receptors Secure long-term maintenance arrangements

SuDS must be operational before any dwelling is occupied.

9.4 Mandatory Infrastructure Delivery Policy Wording

Policy INF-X: Infrastructure Delivery and Phasing

Development at Eastbrook (HG1 - KS2) will not be permitted unless:

All required infrastructure upgrades (education, healthcare, utilities, drainage, highways) are identified Funding is secured Delivery is guaranteed within the plan period Infrastructure is delivered in advance of occupation

The RLDP must demonstrate that infrastructure delivery is viable and enforceable.

9.5 Summary

Without the mandatory policy wording set out above, the RLDP:

Does not secure the evidence required to assess flood risk Does not guarantee that mitigation will be delivered Does not ensure that development will not increase flood risk elsewhere Does not demonstrate deliverability Fails multiple tests of soundness

The inclusion of this wording is essential to ensure that the Eastbrook allocation is sound, effective, and compliant with national policy.

SECTION 10 - HOUSING DELIVERY AND

DEMOGRAPHIC MISALIGNMENT

While Section 4 of the review of the RLDP focuses on high-level data across the Vale, DPCC utilises these specific evidence base shifts to argue that the Eastbrook allocation is no longer justified under the new planning context. The Vale Council have removed S106 affordable housing money (£1m) from Dinas Powys, as we were told there are no housing developments planned and the funds were reallocated to Myrtle Close which negates the suggestion in the RLDP that there is a need for affordable housing in Dinas Powys. Therefore the development should be removed from the RLDP or the S106 moved back to Dinas Powys.

Mapping Section 4 Evidence to Dinas Powys Objections:

1. Review Report Ref: 4.1.1 4.1.11 (Population and Household Projections): Review Report Context: This section details the transition from 2011-based projections to the more recent 2018-based Welsh Government projections, noting a "significant departure" from the evidence that underpinned the original LDP.

Relationship to Dinas Powys: DPCC explicitly links this update to their objection in Ref: this response section 3.1 (Reduction in Overall Housing Numbers). We argue that the more realistic assessment of demographic trends and the subsequent reduction in the total housing requirement for the Vale should "reduce pressure on constrained settlements such as Dinas Powys". We maintain that with lower overall demand, the "unnecessary" and high-risk allocation at Eastbrook should be the first to be removed.

2. Review Report Ref: 4.2.1 - 4.2.15 (Economic Considerations and Employment): Review Report Context: This section reviews the employment land supply and economic growth scenarios for the 2021-2036 period. It lists major strategic employment sites, none of which are located within Dinas Powys.

Relationship to Dinas Powys: In the Preferred Strategy and subsequent objections, Dinas Powys is categorised as a Primary Settlement. DPCC points out that since the Review Report identifies economic and employment growth as being

concentrated in the "Strategic Growth Area" (Barry, Rhoose, St Athan), allocating 250 houses in Dinas Powys creates a car-dependent commuter settlement. This contradicts the Review Report's emphasis on aligning housing with major employment hubs to reduce private car travel.

3. Review Report Ref: 4.3.1 (Conclusion on Evidence Base Changes): Review Report Context: The report concludes that the updated population, economic, and legislative evidence represents a "significant departure from that which informed the existing LDP" and supports the need for a full replacement plan.

Relationship to Dinas Powys: DPCC uses this conclusion to support their Ref: this response section 3.5 (Improved Evidence Base) objection. We argue that because the Vale Council's own Review Report acknowledges a "significant departure" in the evidence base, the Council must also acknowledge that the previous assumptions regarding the deliverability of Eastbrook are now invalid. Specifically, they point to the "improved picture of constraints" (such as the 2020 flood event) that must be re- evaluated under the "robust and transparent" evidence standards called for in Section 4 of this response. Summary of Evidence Linkage: Section 4 of the Review Report provides the technical justification for a "Realistic assessment" of growth. DPCC's position is that if the Vale Council follows its own evidence in Section 4 - which shows lower housing need and a concentration of employment elsewhere - it cannot logically justify a large-scale housing development on a high-flood-risk greenfield site in a "constrained settlement" like Dinas Powys.

SECTION 11 - REQUIRED EVIDENCE FROM THE VALE OF GLAMORGAN COUNCIL

For the Eastbrook allocation to be considered sound, DPCC request that the Vale of Glamorgan Council must provide clear, transparent, and technically robust evidence demonstrating that the site is:

Deliverable Developable Environmentally acceptable Hydrologically safe Supported by adequate infrastructure

At present, this evidence is absent from the RLDP. The following items are required before the allocation can be considered sound.

11.1 Catchment-Wide Hydraulic Modelling

The Council must provide:

A full catchment-wide hydraulic model Prepared in consultation with NRW Covering surface water, groundwater, and overland flow Including climate-change allowances Assessing the 2020 flood event Demonstrating no increase in flood risk to existing properties

This modelling is essential to understand baseline conditions and the impact of development.

11.2 Groundwater Assessment

A detailed groundwater assessment is required to:

Map groundwater emergence zones Assess seasonal variations Identify groundwater pathways Determine the impact of development on groundwater levels Demonstrate that development will not exacerbate groundwater flooding

No such assessment has been provided.

11.3 Overland Flow Route Mapping

The Council must provide:

High-resolution mapping of overland flow routes Assessment of exceedance pathways Identification of downstream receptors

This is particularly important given the 2020 flood event.

11.4 SuDS Feasibility Study

A SuDS feasibility study must be provided to:

Assess infiltration potential Identify viable SuDS options Determine attenuation requirements Demonstrate that SuDS can operate effectively given soil and groundwater constraints

Without this, SuDS cannot be assumed to mitigate flood risk.

11.5 Downstream Drainage Capacity Assessment

The Council must provide:

A full assessment of downstream drainage capacity Identification of constraints Required upgrades Funding mechanisms Delivery timescales

This is essential to ensure that development does not overload existing systems.

11.6 Infrastructure Delivery Plan (IDP) Evidence

The IDP must demonstrate:

Education capacity solutions Healthcare capacity solutions Utilities upgrades Drainage improvements Highways mitigation Funding sources Delivery timescales Viability

At present, the IDP does not provide this level of detail.

11.7 Transport Assessment

A comprehensive transport assessment is required to: Assess cumulative impacts Model peak-time flows Identify junction constraints Provide deliverable mitigation Demonstrate that sustainable transport options exist No such assessment has been provided. 11.8 Landscape and Ecology Evidence

The Council must provide: A landscape and visual impact assessment A biodiversity net-gain strategy A green-infrastructure plan Evidence that ecological impacts can be mitigated These are essential to comply with national policy. 11.9 Summary

The RLDP currently lacks the evidence required to demonstrate that the Eastbrook allocation is: Safe Deliverable Environmentally acceptable Supported by adequate infrastructure Until this evidence is provided, the allocation remains unsound.

SECTION 12 — SCHEMATIC DIAGRAMS (ASCII + PLACEHOLDERS)

This section provides conceptual diagrams to support the hydrological and technical evidence presented earlier. These are illustrative only, not to scale, and intended to help the Inspector and Vale of Glamorgan officers visualise the key issues. Each diagram includes:

An ASCII sketch for immediate clarity A placeholder label for later replacement with a formal graphic in the final PDF

12.1 Diagram 1 — Catchment Overview (Placeholder: FIG-01)

Code [Higher Ground] /\ / \ / V V

Eastbrook Site (Low permeability I soils)

V [Downstream Residential Area]

Placeholder: FIG-01 - Catchment Overview Diagram

12.2 Diagram 2 - Overland Flow Routes (Placeholder: FIG-02)

Code Rainfall I V

Field <-- Overland flow entering site

V

Eastbrook Site Natural flow path I

V [Existing Properties]

Placeholder: FIG-02 - Overland Flow Route Mapping

3712.3 Diagram 3 — Groundwater Emergence Zones (Placeholder: FIG-03)

Code Subsurface Water Table

^ ^ ^ I (Groundwater emergence)

| Eastbrook Site I Saturated ground I

Placeholder: FIG-03 - Groundwater Emergence Conceptual Diagram

12.4 Diagram 4 - SuDS Limitations (Placeholder: FIG-04)

Code [Rainfall]

V [SuDS Basin]

I (Low infiltration) V [Standing Water] I V Risk of exceedance flow I V [Downstream Properties]

Placeholder: FIG-04 - SuDS Feasibility Constraints Diagram

12.5 Diagram 5 - Required Mitigation Sequence (Placeholder: FIG-05)

Code Step 1: Catchment-wide model I V Step 2: Identify mitigation I V Step 3: Secure funding & delivery

V Step 4: Construct mitigation | V Step 5: Only then permit development

Placeholder: FIG-05 - Mitigation Delivery Sequence Diagram

SECTION 13 — FORMAL REQUEST FOR WRITTEN CONFIRMATION FROM THE VALE OF GLAMORGAN COUNCIL

Given the significant unresolved constraints associated with the Eastbrook allocation, Dinas Powys Community Council formally requests written confirmation from the Vale of Glamorgan Council addressing the following matters. These confirmations are essential to demonstrate that the allocation is sound, deliverable, and compliant with national policy.

The Council requests that the Vale of Glamorgan provides a written response to each point below.

13.1 Confirmation of Catchment-Wide Modelling

Please confirm:

Whether a catchment-wide hydraulic model has been commissioned Whether NRW has been consulted on the scope Whether the model includes surface water, groundwater, and overland flow Whether the model assesses the 2020 flood event Whether the model demonstrates no increase in flood risk to existing properties

If no such model exists, please confirm:

When it will be commissioned When it will be completed Whether the RLDP will be updated to include its findings

13.2 Confirmation of Groundwater Assessment

Please confirm:

Whether a detailed groundwater assessment has been undertaken Whether groundwater emergence zones have been mapped Whether development will alter groundwater pathways Whether mitigation is technically feasible

If no assessment exists, please confirm when it will be prepared.

13.3 Confirmation of Overland Flow Route Mapping

Please confirm:

Whether high-resolution overland flow mapping has been completed Whether exceedance routes have been identified Whether these routes can be preserved within the development layout

If not, please confirm when this work will be undertaken.

13.4 Confirmation of SuDS Feasibility

Please confirm:

Whether infiltration testing has been undertaken Whether infiltration-based SuDS are viable Whether attenuation volumes have been calculated Whether SuDS can operate effectively given soil and groundwater constraints

If not, please confirm when a SuDS feasibility study will be completed.

13.5 Confirmation of Downstream Drainage Capacity

Please confirm:

Whether downstream drainage capacity has been assessed Whether upgrades are required How upgrades will be funded When upgrades will be delivered Whether upgrades will be delivered before development begins

If no assessment exists, please confirm when it will be undertaken.

13.6 Confirmation of Infrastructure Delivery

Please confirm:

How education capacity will be increased How healthcare capacity will be expanded How utilities and drainage upgrades will be funded How highways mitigation will be delivered Whether all required infrastructure is viable and deliverable within the plan period

If not, please confirm when the Infrastructure Delivery Plan will be updated.

13.7 Confirmation of Transport Assessment

Please confirm:

Whether a cumulative transport assessment has been undertaken Whether junction capacity constraints have been modelled Whether deliverable mitigation has been identified Whether sustainable transport improvements are committed and funded

If not, please confirm when this work will be completed.

13.8 Confirmation of Environmental and Landscape Evidence

Please confirm:

Whether a landscape and visual impact assessment has been prepared Whether a biodiversity net-gain strategy exists Whether a green-infrastructure plan has been completed Whether location-specific modelling to assess air quality, specifically, near schools at peak times has been undertaken.

If not, please confirm when these assessments will be undertaken.

13.9 Summary

The Vale of Glamorgan Council must provide written confirmation addressing each of the above points. Without this information, the Eastbrook allocation remains unsupported by evidence and therefore fails multiple tests of soundness.

13.10 Key objections

1. Procedural and Consultation Failures

Lack of Transparency: There is no evidence of formal record-keeping for public attendance at events or a transparent ledger showing how resident feedback was synthesized into the Plan.

Digital Barriers and Exclusion: The "online-first" strategy and complex account- creation process created a disproportionate burden for residents, particularly non-digitally native and elderly demographics who lacked accessible summaries.

Pre-determination: The requests, by DPCC, for more accessible scheduling were refused, leading to a perception that strategies were fixed prior to engaging public opinion.

When asked about the revised plans as stated in an email to DPCC we were told there were none. 2. Hydrology and Unresolved Flood Risk

The 2020 Flood Precedent: On December 23, 2020, a storm caused internal flooding to 98 properties in Dinas Powys. The Section 19 Flood Investigation Report confirmed "hydraulic locking" occurred, where elevated river levels prevented surface water systems from discharging, causing sewer surcharging.

Obsolete Evidence Base: The RLDP relies on a 2013 Strategy and a September 2020 NRW decision that predates the major 2020 flood. No catchment-wide modelling incorporating 2020 data has been undertaken.

SuDS Infeasibility: High groundwater (as shallow as 1.83m) and shallow bedrock render standard infiltration-based Sustainable Drainage Systems (SuDS) unproven and high-risk for this site.

3. Transport and Highways Constraints

Chronic Congestion: The A4055 (Cardiff Road) and Merrie Harrier junction are already at capacity. The Plan fails to assess the cumulative impact of major regional growth in Barry (376 units) and Penarth (576 units) on these local corridors.

Active Travel and Accessibility Failures: Eastbrook Station lacks bilateral access; residents with limited mobility or prams must undertake a one-mile detour to reach the Cardiff-bound platform because there is no lift.

Safety Issues: Existing pedestrian routes are too narrow for double buggies and are frequently obstructed by weekly refuse collections, forcing vulnerable pedestrians into the carriageway.

4. Exhausted Social and Utility Infrastructure

Healthcare Strain: The Dinas Powys Medical Centre is at full capacity with a list size of approximately 11,000 patients, far exceeding idealized UK GP-to- patient ratios.

Education Capacity: Local schools are operating at or near peak capacity with no identified land or funding for expansion.

Wastewater Capacity: There is no settlement-specific evidence that the consented capacity of local treatment works can accommodate 250 additional dwellings without risk of sewer surcharging.

5. Environmental and Ecological Impact

Irreplaceable Habitats: The site is adjacent to Ancient Woodland (Coed Clwyd-Gwyn and Case Hill Wood), which cannot be mitigated by new planting.

European Protected Sites: The HRA confirms the site is within 2.6km of the Severn Estuary SAC/SPA/Ramsar and explicitly concludes that "Mitigation is Required".

Air Quality: The Dinas Powys Roadside monitoring station was closed in 2016, and the Plan lacks location-specific modelling to assess the impact of increased peak-time idling near schools.

6. Housing Delivery and Demographic Misalignment Lack of Downsizing Options: Despite an aging population, the Plan contains no mandatory requirement for single-story bungalows, which are needed to free up family-sized housing stock. Affordable Housing Viability: The Community Council argues that high un- costed infrastructure burdens (flood and highway mitigation) make the 40% affordable housing target financially unviable.

S106 Transparency: £1M in S106 affordable housing funds from previous developments was diverted away from Dinas Powys because we were told there were no housing developments in Dinas Powys. Therefore the money has to be refunded or the 250 houses removed from the RLDP.

SECTION 14 — INITIAL E-MAIL FROM DPCC TO VALE OF GLAMORGAN COUNCIL (dated 29/01/2026)

The Local Development Team confirmed receipt of a formal email from Dinas Powys Community Council on 3 February 2026. This email was also sent to Senior Planning Officer, Ian Robinson and CEO, Rob Thomas. It is appended below:

'Dear Sir / Madam,

Re: Formal Objection to the Proposed Allocation of Eastbrook (DNP-H1) in the Replacement Local Development Plan (RLDP)

Dinas Powys Community Council submits this formal objection to the proposed allocation of the Eastbrook site (SP4 KS2) within the Vale of Glamorgan Replacement Local Development Plan (RLDP). The Eastbrook allocation remains fundamentally flawed due to unresolved constraints relating to:

Flood risk and hydrology Highways and transport capacity Environmental and landscape impact Infrastructure limitations Deliverability and viability

The site lies within a hydrologically sensitive catchment characterised by groundwater emergence, overland flow routes, low-permeability soils, and a history of significant flood events, including the 2020 incident. Natural Resources Wales (NRW) has repeatedly raised concerns about flood risk at this location, and the Council's own evidence base acknowledges the need for catchment-wide modelling before any development can be considered.

The RLDP does not currently include:

Mandatory policy wording to secure pre-delivery of mitigation Requirements for catchment-wide modelling Guarantees that development will not increase flood risk elsewhere Evidence that mitigation is viable, deliverable, and enforceable

Without these safeguards, the allocation fails several tests of soundness, including CE2, CE3, and CE4.

Eastbrook in Dinas Powys is considered to be in a high-risk flood area. It is located within the catchment of the Cadoxton River and its tributary, the East Brook, which have a history of overflowing, causing significant, frequent flooding to homes and roads.

River and Surface Water Flooding: The area experiences flooding from the East Brook and the River Cadoxton. Intense rainfall can also overwhelm the surface water and sewerage systems, causing additional property flooding.

High Water Levels: The ground in the area, particularly in fields adjacent to existing properties, is often described as "totally waterlogged" for significant portions of the year, indicating a high- water table.

Key details regarding flood risk in this area include: High Risk Area: Natural Resources Wales (NRW) has identified a significant risk of flooding from the Cadoxton River and East Brook, affecting areas like St Cadocs Avenue, Greenfield Avenue, Elm Grove Place, and Cardiff Road.

Significant History: The area has experienced multiple flooding events, including major incidents in 1948, 1986, 1998, 1999, 2008, 2012, 2013, and a severe event in December 2020 where approximately 40-100+ properties were affected.

Future Risk: Due to climate change, the number of properties at risk of flooding in the area is expected to increase from nearly 200 to over 350 by 2117.

Causes: The area suffers from rapid runoff from the surrounding hillsides, which overwhelms the capacity of the river channels and drains. NRW has been exploring options for a flood management scheme, including natural flood management and potential engineering solutions, to reduce the risk to the community. It is recommended to check the specific, up-to-date flood map for any particular property on the NRW website.

The Dinas Powys Community Council formally requests written confirmation from the Vale of Glamorgan Council addressing the following matters:

1. Has a catchment-wide hydraulic model has been commissioned, completed, and agreed with NRW? If so, does the model demonstrate no increase in flood risk to existing properties? 2. Have groundwater emergence, overland flow routes, and the 2020 flood event have been assessed? 3. Are SuDS viable given soil and groundwater constraints? 4. Has downstream drainage capacity been assessed and, if necessary, upgraded? 5. Will education, healthcare, utilities, and highways infrastructure be expanded to support the allocation? a) Has consultation taken place with the GP surgery/Local schools? b) What additional services will be provided? 6. Have deliverable and funded mitigation for transport and highways impacts been identified? a) Please provide figures of air pollution and traffic flow surveys along Cardiff Road. What is the capacity along Cardiff Road? b) Department of transport will not be investing in Eastbrook station. Therefore, no lift/ramp to address the needs of the community. Yet it is being used to form a decision about the housing. Please explain the reason behind this?

7. Have landscape, biodiversity, and green-infrastructure assessments been completed? a) Apparently the placemaking workshop has helped refine proposals. What are the refinements and when can we see the results from the surveys people completed at the Murchfield consultation?

In the opinion of Dinas Powys Community Council these confirmations are essential to demonstrate that the allocation is sound and that development will not increase flood risk or place unacceptable pressure on local infrastructure.

The Vale Council state that millions of pounds of Dinas Powys S106 funding could be moved to Myrtle Close in Penarth as 'there are no developments' in Dinas Powys. If this is the case Eastbrook needs to be removed from the RLDP or the money should stay allocated to Dinas Powys.

The Vale Council allocated 900-1500 houses for Argae lane. But once the site was considered not viable the figures were reviewed and they were reduced in number and moved to another site.

Where is the evidence that 250 houses are needed in Eastbrook? The Eastbrook site was turned down before. Why? What has changed to make it viable now? Have the Vale Council exhausted all the key sites outlined in the previous LDP and if not why? Have the Vale Council used all of their rolled forward housing sites? Have the Vale Council carried out a Sequential Test? Proving there are no lower risk sites available? Has the Exception test been carried out? Ensuring the development will be made safe throughout its lifetime without increasing floor risks elsewhere? Out of the 250 houses 40% will be affordable housing. Managed by housing associations according to Persimmon glossy proposal. What is classed as affordable housing? Birth rate has fallen for a number of years, and the elderly population is increasing. How do you justify these figures? What proportion of the proposed 250 houses will be age friendly?

In the appendix to the Homes and Safe Communities Scrutiny Committee report (6th January 2024), there is a comment regarding the need for bungalows. Residents and councillors enquired about bungalows enabling people to downsize and free up family homes. We were told they are providing what the Vale has requested. We met with housing and they said, 'it won't happen'. So knowing there is a need for elderly accommodation what is the plan to address this need?

By 2034, 1 in 4 will be over the age of 65. This is an increase of 75% from 9.3% in 2018 to 13.7% in 2038.

The Vale indicates 70% of the housing need is in Barry/Penarth and Llandough. Of the remaining 30% what percentage is allocated to Dinas Powys? You state greatest areas of demand are Penarth/Barry and Llandough but there is no mention of Dinas Powys.

In conclusion, in the absence of the required evidence and mandatory policy safeguards, the Eastbrook allocation remains unsound. The Dinas Powys Community Council therefore requests that the Vale of Glamorgan Council: Removes the Eastbrook allocation from the RLDP, or Incorporates the mandatory policy wording and evidence requirements set out above. We look forward to receiving your written response. Yours faithfully, Clerk on behalf of Dinas Powys Community Council'

SECTION 15 — CONCLUSION OF THE

TECHNICAL OBJECTION

Dinas Powys Community Council recognises the importance of delivering sustainable, well-planned growth across the Vale of Glamorgan. The revised RLDP contains some positive and constructive changes, and the Council welcomes the improved emphasis on sustainability, climate resilience, and infrastructure capacity. However, despite these improvements, the proposed allocation of the Eastbrook site (HG1 - KS2) remains fundamentally unsound.

The evidence presented in this objection demonstrates that:

The site lies within a highly sensitive hydrological catchment Flood risk is influenced by surface water, groundwater, and overland flow The 2020 flood event provides clear evidence of the site's vulnerability NRW has repeatedly raised concerns that have not been resolved No catchment-wide hydraulic modelling has been undertaken SuDS feasibility is unproven due to soil and groundwater constraints Downstream drainage capacity has not been assessed Transport and highways impacts remain unmitigated Education, healthcare, and utilities infrastructure are already under pressure No evidence demonstrates that required mitigation is viable, fundable, or deliverable The RLDP lacks mandatory policy wording needed to secure mitigation and ensure no increase in flood risk elsewhere

As a result, the allocation fails multiple tests of soundness, including:

CE2 - Coherence and effectiveness CE3 - Environmental protection CE4 - Deliverability

Until the Vale of Glamorgan Council provides the required evidence and incorporates the mandatory policy wording set out in this document, the Eastbrook allocation cannot be considered sound. The Dinas Powys Community Council therefore respectfully requests that the Vale of Glamorgan Council:

1. Removes the Eastbrook allocation from the RLDP, or 2. Incorporates the mandatory policy wording, evidence requirements, and safeguards detailed in this objection

Failure to address these issues will leave the RLDP vulnerable to challenge at Examination and may result in development that increases flood risk to existing residents, places unacceptable pressure on local infrastructure, and undermines the environmental quality of Dinas Powys.

Dinas Powys Community Council remains committed to constructive engagement and looks forward to receiving the Vale of Glamorgan Council's written response to the matters raised.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Dinas CC Response - https://valeofglamorgan.oc2.uk/a/3r7
Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/4rv

4862 Object

Document Element: SP2 – SETTLEMENT HIERARCHY

Respondent: Emma Reed [2653]

Summary:

The role of Rhoose is over stated and more development should be concentrated in Barry and the Service settlements. For example Llantwit Major has many opportunities with excellent services (Rhoose residents have to travel there for some services) yet it is not taking significant housing building for political reasons. More opportunities therefore need to be found in Llantwit Major as well as the other higher order settlements. The candidate sites show that there are opportunities.

Full text:

The role of Rhoose is over stated and more development should be concentrated in Barry and the Service settlements. For example Llantwit Major has many opportunities with excellent services (Rhoose residents have to travel there for some services) yet it is not taking significant housing building. Why? Well Llantwit Major Independents hold the balance of power for the administration and Labour do not want to upset them. More opportunities therefore need to be found in Llantwit Major as well as the other higher order settlements. The candidate sites show that there are opportunities.

Change suggested by respondent:

Sites to be identified via a better candidate site process concentrating on requesting opportunities in higher order settlements reducing the need for Rhoose to take an additional 800 units plus at Rhoose Point and Readers Way over the next 10 years. The site to the east of Barry should be reinstated and documents made public to the Inspector as to why it did not proceed.

Sound: No

Attachments: None

5115 Support

Document Element: SP2 – SETTLEMENT HIERARCHY

Respondent: Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]

Summary:

Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.
Without prejudice to the Minster's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.
National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.
After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:
Annex 1 – General Conformity with Future Wales
• No significant concerns
Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)
• Spatial Strategy and Primary Settlements
• Housing and Economic Growth Levels – Regional Collaboration

• Maximising Affordable Housing Provision
• Delivery & Implementation – General
• Gypsy and Travellers
• Renewable Energy
• Minerals
• Best and Most Versatile Agricultural Land (BMV)
• Welsh Language

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.
My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.
Yours sincerely,
Neil Hemington
Chief Planner Welsh Government

Annex 1 - Statement of General Conformity
The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).
There is a joint position statement on the relationship between Bridgend, Cardiff and the Vale of Glamorgan (BP20A), which considers population growth, migration patterns, housing completions, employment characteristics, demographics, commuting and transport links between the three adjoining authorities. The Welsh Government supports the principle of this work which demonstrates how change in the Vale of Glamorgan relates and complements growth in adjoining local authorities. This approach illustrates a good mechanism for other local authorities to follow.
Reasons
Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the climate change and biodiversity emergencies, making the best use of resources.
Policy 1 and Policy 33 of Future Wales states that Cardiff, Newport, and the Valleys will be the main focus for growth and investment in the region. The strategic diagram (p163) also identifies the Vale of Glamorgan within the National Growth Area. The Vale of Glamorgan RLDP, specifically BP20A, provides robust evidence on the interrelationship and key issues with adjoining authorities, including their interaction and how they have shaped and influenced the scale/location of growth in the RLDP. This is set out in the three Joint Position Statements (JPSs).
BP45 'Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR), May 2024, provides further evidence on how the scale of growth indicated for the region has shaped the scale of future economic growth within the Vale of Glamorgan. This results in a higher level of employment growth in the Vale of Glamorgan primarily to increase self-containment and reduce out-flows to adjoining urban areas. Two key areas for future economic growth are identified at Cardiff Airport/Bro Tathan Enterprise Zone and Aberthaw Power Station.
The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.
On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):
Policy 1: Where will Wales grow
Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 6: Town Centre First
Policy 10: International Connectivity – Cardiff Airport
Policy 12 Regional Connectivity
Policy 33: National Growth Area – Cardiff, Newport and the Valleys
Policy 36: South-East Metro
Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of

Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.
With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.
The Level of Growth - Homes and Jobs
The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).
Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.
BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.
Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.
The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level of growth proposed in the plan.
We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.
The Welsh Government notes that BP0A identifies small and large windfalls, based on historic trends of 53/yr and 80/yr

respectively. Also, the large windfalls are not included in the first two years of the trajectory, as per the DPM. A non-delivery allowance of 5% is identified, which reflects local characteristics in the Vale of Glamorgan. A flexibility allowance of 9.8% has been factored into the provision. The Welsh Government supports this approach, although whilst Appendix 1 contains a housing trajectory, there is no table to mirror that of Table 21, DPM. This should be included in Appendix 1. 6

Jobs: The Council's 10-year dwelling-led growth option results in a requirement for 4,875 new jobs (325 p/a) over the plan period. This broadly aligns with the projected growth for 5,338 (355 p/a) new jobs in the Employment Land Review (BP12) and as set out in Policy SP14.
The level of employment growth proposed (5,338 jobs) over the plan period is below the target in the currently adopted plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.
In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of homes and jobs proposed in the plan, which is in general conformity with Future Wales.
Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.
The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.
Paragraph 6.137 of the plan states:
"Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary."
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?
Affordable Housing Exceptions Sites
Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.
Employment Land
The Council's Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).
Delivery and Implementation
PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.
The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5)

totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.
The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have 'rolled over' from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.
The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters.
It will be for the Council to justify deliverability supported by robust financial viability.
Gypsy and Travellers
The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are 'immediate' by 2026. WG note that 4 pitches have since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

Policy SP9 identifies a site at Llangan (0.76Ha) to accommodate the 7 pitches needed. It will be for the Council to demonstrate the appropriate site selection assessment process has been followed and that the site complies with requirements in PPW (4.2.35), Circular 005/2018 (paragraph 35) any relevant guidance and the DPM (5.80-5.85) to allocate a deliverable site in the plan period. The views of the relevant statutory bodies must also be agreed with no outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.
Renewable Energy
Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Could the Council provide an update on alternative options for a DHN in Barry?
It is welcome that the Renewable Energy Assessment (REA) has considered BMV policy, specifically for solar PV, and use of the Predictive ALC Map. The assessment has only considered non-BMV land (Subgrade 3b, Grade 4 and 5). The assessment would benefit from referencing the clarification provided in the DCPO letter of 1st March 2022 in respect of solar PV and BMV agricultural land for completeness.
The study identifies that in the Vale of Glamorgan solar development is more suitable than wind energy because of the flight path of aircraft in the south of the County Borough. However, there are some opportunities for wind sites, but these are likely to be small (<10MW) where aviation risks are lower and there is some grid access. Conversely, there are large expanses of land suitable for solar areas (>10MW) to the West of the County Borough, where there is little existing development. The study identifies 20 large-scale solar areas but recognises that grid constraints may impact the ability of sites to come forward.
Solar and wind search areas (where appropriate) below the 10MW Developments of National Significance (DNS) have been identified (Policy CC3). The plan also includes a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW (Policy CC4). Policy CC3 makes reference to adhering to the criteria in Policy CC4. However, would it not be the case that if search areas have been identified in Policy CC3 have they not already met the criteria? If they would not, should they be identified in the first place? Clarity would be beneficial. The Welsh Government supports the approach but seeks clarity on the point raised.
The Welsh Government notes the proposed search areas for wind energy near Morfa Ystrad Owen/Nant Rhydhalog, according to the Peatlands of Wales Evidence Score Map, the search area includes areas of peatland (Evidence Score 4). The site is also a SINC. This raises concerns as to how the inclusion of this search areas meets the policy test in PPW 6.4.15, 1a and 1b (Stepwise) regarding avoidance of irreplaceable peatland habitats and PPW 6.4.34.
Policy CC4 refers to Developments of National Significance (DNS) in 6.344 and 6.346. This should now refer to Strategic Infrastructure Projects (SIP) which replaced DNS.
Minerals
The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in the Vale of Glamorgan. The Welsh Government policy clarification letter (dated 11 November 2021) identifies a surplus of 1.68mt of crushed rock. As there is a surplus of crushed rock reserves and a lack of sand and gravel production in the Vale, no specific allocations are required in the replacement plan. It is unclear whether a Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region been agreed, or does the latest Position Statement (July 2022) explain how any shortfall will be met across 9

the region, particularly for crushed rock, of which the Vale has a surplus? Clarification would be beneficial.
BMV Agricultural Land
The Welsh Government has engaged with the Council for land quality advice, survey advice and ALC survey validation for candidate sites. The LPA has produced a specific topic paper on BMV policy application. BP23A. The Deposit RLDP allocates 188 hectares of housing land, 5.62 ha is identified as BMV land (under 3% of total housing allocations). The RLDP:
• Has sought to avoid BMV land wherever possible;
• Uses the Predictive ALC Map as a core evidence layer to inform: The spatial strategy;
• Settlement hierarchy decisions; and
• Candidate site assessments.

•
• Directs strategic growth to areas with least BMV land
• Removes or avoids allocations where BMV impacts were significant or unjustified.
• Quantifies total BMV loss and demonstrates it is minimal (5.62ha) and proportionate at plan level.
• Applies a sequential approach through: Preference for brownfield and non-BMV sites;
• Replacement of higher-BMV sites with lower-grade alternatives where possible.
•
• Requires site-specific ALC surveys to verify actual land quality before allocation.
• Demonstrates that allocated BMV land is: Often small, fragmented, or constrained;
• Sometimes previously disturbed or incapable of being farmed differently from surrounding lower-grade land; and
• Necessary to deliver the Plan's housing strategy where reasonable alternatives are unavailable.
•

In conclusion, the Welsh Government consider the Authority has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy, and on that basis no objection is offered.
Green Infrastructure
Policy SP19 should explicitly reference the need for development to be accompanied by a Green Infrastructure Statement.
PPW12 requires decision makers to apply the step wise approach to GI, with enhancement secured at every stage where possible, there is no distinction made between the quality of the GI assets – the qualification in the policy statement that states proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure should be redrafted to remove the quality reference. The need to avoid an impact in the first instance should also be explicitly incorporated into the policy.
Criterion 1 (Policy SP20) should be redrafted – the stepwise approach in PPW 12 6.4.15 1a - does not distinguish between relative ecological value – the avoidance step applies to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.
Welsh Language
There is limited reference to the Welsh language in the plan, either potential adverse impacts arising through development, or mechanisms via a policy framework to support and grow the use of the language. There are references to a number of Welsh-medium schools (3.26) and the increase in the number of people able to speak Welsh according to the 2011 census (3.52) but there is no mention of the authority's Welsh Language Strategy or promoting or cross-referencing to the aims of 10

Cymraeg 2050: A million Welsh-speakers. Paragraph 6.81 of the plan refers to development north west of Barry: "Land at North West Barry is allocated for a residential development of up to 376 dwellings and public open space. The site is in a sustainable location on the edge of the Barry, a key settlement, in a location that is well served by services and facilities, including a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium and Church in Wales) and two high schools (English and Welsh Medium) all located in reasonable walking distance. There is an active travel route along Port Road West, bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry. Barry station is 1.3 miles from the site entrance."
There is no mention that the Council want to undertake a Welsh Language Impact Assessment (WLIA) so there appears no attempt to measure the impact on the Welsh schools resulting from housing development? Could the Council clarify if such implications have already been covered in the WLIA for the plan, ISA, or are any specific policies necessary?

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/syf

5378 Object

Document Element: SP2 – SETTLEMENT HIERARCHY

Respondent: Mr Gareth Thomas [2975]

Summary:

I believe the reclassification of Wick as a Primary Settlement is unjustified based on its limited differences with nearby villages like St Brides Major. The evidence does not demonstrate Wick's significantly greater service role, accessibility, infrastructure, or employment opportunities. The slight advantages, such as proximity to a train station, are negligible in practice, especially given the comparable proximity of St Brides Major to a better-served rail station. Without clear evidence of Wick's wider service functions or sustainability, its reclassification risks contradicting the spatial strategy of promoting development in the most sustainable locations.

Full text:

The reclassification of Wick as a Primary Settlement appears unjustified when considered against the settlement hierarchy and the characteristics normally associated with settlements expected to accommodate a greater proportion of growth. The evidence base provides limited explanation for this change and does not clearly demonstrate that Wick performs a significantly greater service role or has materially better accessibility, infrastructure, or employment opportunities than comparable nearby villages such as St Brides Major, which remains classified as a Minor Rural Settlement despite appearing to have a broadly similar level of local facilities. For example, although Wick has scored ‘higher’ than St Brides Major in several categories due to it being ‘closer’ to other amenities such as a train station, in reality this equates to only a few extra minutes by car or bus (noting they are served by the same bus route) as the difference is barely 3 miles along a winding national speed limit road with no footpaths (and thus not safely walkable or cyclable), as is the onward journey between Wick and Llantwit Major; travelling via the National Cycle Route through St Donat’s would take the journey over the 5 mile scoring threshold for Wick. Thus, in practical terms the difference is negligible and, in fact, St Brides lies geographically closer to Bridgend rail station which has a far greater service provision than Llantwit Major. This objection is not intended to suggest that St Brides’s Major should also be a Primary Settlement, but to argue that by comparison, Wick should not be reclassified. Without clear evidence that Wick functions as a wider service centre or offers greater sustainability credentials, its reclassification risks being inconsistent with the plan’s spatial strategy of directing development toward the most sustainable and well-served locations.

Change suggested by respondent:

Wick should remain classified as a Minor Rural Settlement.

Sound: No

Attachments: None

5393 Object

Document Element: SP2 – SETTLEMENT HIERARCHY

Respondent: Mrs Clair Thomas [3069]

Summary:

I believe the reclassification of Wick as a Primary Settlement is unjustified based on its limited differences with nearby villages like St Brides Major. The evidence does not demonstrate Wick's significantly greater service role, accessibility, infrastructure, or employment opportunities. The slight advantages, such as proximity to a train station, are negligible in practice, especially given the comparable proximity of St Brides Major to a better-served rail station. Without clear evidence of Wick's wider service functions or sustainability, its reclassification risks contradicting the spatial strategy of promoting development in the most sustainable locations.

Full text:

The reclassification of Wick as a Primary Settlement appears unjustified when considered against the settlement hierarchy and the characteristics normally associated with settlements expected to accommodate a greater proportion of growth. The evidence base provides limited explanation for this change and does not clearly demonstrate that Wick performs a significantly greater service role or has materially better accessibility, infrastructure, or employment opportunities than comparable nearby villages such as St Brides Major, which remains classified as a Minor Rural Settlement despite appearing to have a broadly similar level of local facilities. For example, although Wick has scored 'higher' than St Brides Major in several categories due to it being 'closer' to other amenities such as a train station, in reality this equates to only a few extra minutes by car or bus (noting they are served by the same bus route) as the difference is barely 3 miles along a winding national speed limit road with no footpaths (and thus not safely walkable or cyclable), as is the onward journey between Wick and Llantwit Major; travelling via the National Cycle Route through St Donat's would take the journey over the 5 mile scoring threshold for Wick. Thus, in practical terms the difference is negligible and, in fact, St Brides lies geographically closer to Bridgend rail station which has a far greater service provision than Llantwit Major. This objection is not intended to suggest that St Brides's Major should also be a Primary Settlement, but to argue that by comparison, Wick should not be reclassified. Without clear evidence that Wick functions as a wider service centre or offers greater sustainability credentials, its reclassification risks being inconsistent with the plan's spatial strategy of directing development toward the most sustainable and well-served locations.

Change suggested by respondent:

Wick should remain classified as a Minor Rural Settlement.

Sound: No

Attachments: None

5702 Support

Document Element: SP2 – SETTLEMENT HIERARCHY

Respondent: Cardiff Capital Region Energy (Mr Phil Nightingale, Project Delivery Director) [2736]

Summary:

CCR Energy welcomes the recognition of St Athan and Rhoose as Primary Settlements within the Vale of Glamorgan's Strategic Growth Area. The designation reflects their strong range of services, facilities, and strategic location, supporting sustainable employment growth. The proposed redevelopment of the former Aberthaw Power Station as the Cardiff Capital Region Aberthaw Green Energy Park complements this approach, creating high-quality employment and innovation opportunities. Combined with proximity to Cardiff Airport, the Bro Tathan Enterprise Zone, and planned transport improvements, these settlements are well placed to accommodate growth, support regional economic development, and enhance connectivity, skills, and prosperity within the Vale

Full text:

CCR Energy welcomes the recognition of St Athan and Rhoose as Primary Settlements within the Vale of Glamorgan's Strategic Growth Area. The designation reflects their strong range of services, facilities, and strategic location, supporting sustainable employment growth. The proposed redevelopment of the former Aberthaw Power Station as the Cardiff Capital Region Aberthaw Green Energy Park complements this approach, creating high-quality employment and innovation opportunities. Combined with proximity to Cardiff Airport, the Bro Tathan Enterprise Zone, and planned transport improvements, these settlements are well placed to accommodate growth, support regional economic development, and enhance connectivity, skills, and prosperity within the Vale

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5815 Object

Document Element: SP2 – SETTLEMENT HIERARCHY
Respondent: Mr William Hart [1009]

Summary:
If Barry is already the largest town in the vale it doesn't need to be made any larger.

Full text:
If Barry is already the largest town in the vale it doesn't need to be made any larger.

Change suggested by respondent:
The number/size of housing developments in Barry should be reduced.

Sound: No
Attachments: None

6006 Object

Document Element: SP2 – SETTLEMENT HIERARCHY
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:
The RLDP seeks a high proportion of affordable homes alongside prescriptive policies on NZC and residential density. Sufficient flexibility in policy application and housing mix is essential to maintain site viability and ensure housing delivery. Policy SP2 requires 50% on-site affordable housing and limits site sizes to 25 dwellings in Minor Rural Settlements and 50 in Primary Settlements. The lack of viability flexibility and arbitrary cap on dwelling numbers undermines delivery. For example, Allocation HG4(1) provides 25 dwellings, effectively requiring 52% affordable housing; increasing the total to 26 dwellings would ensure the 50% requirement remains a true minimum.

Full text:

Policy SP2 lists Colwinston as a "Minor Rural Settlement" in the settlement hierarchy. Policy SP2 also states that:

"For the purposes of this policy small scale affordable housing led developments are defined as providing a minimum of 50% affordable housing on sites of up to 25 dwellings in Minor Rural Settlements or up to 50 dwellings in Primary Settlements. The type, scale and mix of affordable housing will be expected to reflect the latest evidence, including specialist older person housing. Proposals which do not meet the minimum 50% affordable housing provision will not be supported."

The RLDP seeks a high proportion of affordable homes alongside other overly prescriptive policies relating to net zero carbon emissions from new dwellings, residential density, and open space provision. In order to achieve these objectives in a deliverable and sustainable way, it is essential that the RLDP provides sufficient flexibility in both policy application and housing mix. Without such flexibility, the cumulative impact of multiple prescriptive requirements risks undermining site viability. A balanced approach is therefore necessary to ensure that the Council's housing, climate, and place making ambitions can be realised without constraining the delivery of much needed homes.

Policy SP2 requires on-site provision of 50% affordable homes on all new sites in Minor Rural and Primary Settlements. Policy SP2 as drafted also limits maximum dwelling numbers to sites of 25 dwellings in Minor Rural Settlements and up to 50 swellings in Primary Settlements. There are a number of concerns with this approach as drafted:

1. Whilst it is understood that it is a core RLDP objective to deliver much needed affordable homes in VoG, Policy SP2 must incorporate sufficient flexibility to allow for viability considerations to be taken into account. Whilst it is understood that the sites proposed for allocation in the RLDP will have provided a Viability Assessment demonstrating that they can be delivered, there is a need to be cautious. Additional policy burdens (e.g. those relating to net zero carbon operational development) could go beyond what has been tested at RLDP preparation stage. Without an explicit mechanism to consider viability, the delivery of entire allocations, both market and affordable housing across the Minor Rural and Primary Settlements, could be jeopardised unintentionally. The blanket approach to the 50% affordable housing requirement across site allocations fails to consider the unique technical complexities of each individual allocation that are required to be overcome before sites can be delivered. This is in direct contrast to PPW paragraph 4.2.32 which states that:

"When setting the affordable housing thresholds and/or site-specific targets planning authorities must consider their impact on site viability to ensure residential sites remain deliverable."

2. The upper limits of 25 and 50 dwellings for Primary and Minor Rural Settlements respectively are arbitrary and unevidenced. Given the identified need for housing and affordable housing as set out in our comments to Policy SP1, allocated Rural Affordable Housing-Led Sites that have limited constraints (e.g. Allocation HG4(1)) should be allowed to be expanded and accommodate further dwelling numbers should the sites be suitable to allow this. Each site should be considered on its own merit rather than having a 25 unit limit applied as a matter of course. Allocation HG4(1) is located in the HMA of Llandow. Table 5 of the Draft Local Housing Market Assessment 2023 Summary Note Evidence Base Document provides an estimate of the overall additional affordable housing need from 2023 to 2038 as being 52 units per annum which is significantly more than what is proposed for allocation. It is also worth noting that Registered Social Landlords will prefer to have a higher number of affordable units under their management in a particular location to ensure efficiencies in management and operation.

3. Land to the East of Colwinston (HG4(1)) is allocated for 25 dwellings with a minimum provision of 50% on-site affordable housing. As 50% of 25 is 12.5 dwellings, this would need to be rounded up to 13. As such, allocation HG4(1) is required to provide a minimum of 52% on-site affordable housing. As a minimum, allocation HG4(1) should be allowed to provide 26 dwellings so that the "minimum" on-site provision of 50% set out by Policy SP2 is truly a minimum.

Change suggested by respondent:

The consideration of viability and the removal of the arbitrary upper limits on site sizes for allocations in Primary and Minor Rural Settlements will ensure that Policy SP2 meets the third test of soundness (Will the Plan deliver?). The proposed amendment to the wording of Policy SP2 is as follows:

"For the purposes of this policy small scale affordable housing led developments are defined as providing a minimum of 50% affordable housing on sites of circa 25 dwellings in Minor Rural Settlements or circa 50 dwellings in Primary Settlements. The type, scale and mix of affordable housing will be expected to reflect the latest evidence, including specialist older person housing. Proposals which do not meet the minimum 50% affordable housing provision will not be supported."

Sound: No

Attachments: None

6014 Comment

Document Element: SP2 – SETTLEMENT HIERARCHY

Respondent: Mrs Jacky Williams [3343]

Summary:

Rhoose has been identified as a Primary Settlement, reflecting the range of services and facilities available. The current services and facilities are insufficient for the size that the village has now grown into. New housing developments have, in the past, failed in their commitment to provide shops and community spaces – the Rhoose Point development is a case in point – land defined for facilities lay undeveloped for years and then housing was built on it. Transparency and accountability by the council is essential if 'contribution towards' replaces actual provision.

Full text:

Rhoose has been identified as a Primary Settlement, reflecting the range of services and facilities available. The current services and facilities are insufficient for the size that the village has now grown into. New housing developments have, in the past, failed in their commitment to provide shops and community spaces – the Rhoose Point development is a case in point – land defined for facilities lay undeveloped for years and then housing was built on it. Transparency and accountability by the council is essential if 'contribution towards' replaces actual provision.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6115 Object

Document Element: SP2 – SETTLEMENT HIERARCHY

Respondent: Ms Lucie Taylor [2506]

Summary:

Social Farms & Gardens urge the Vale of Glamorgan Council to protect existing and potential food growing sites, particularly high-grade agricultural land, which should be safeguarded for sustainable agriculture. Poor development opportunities (high grade agricultural land) near Culverhouse Cross and Wenvoe should not be seen as a threat but as an opportunity to preserve land for food growing. We recommend including policies that support food growing enterprises, acknowledging various types of initiatives beyond allotments. Greenfield land should be reserved for horticulture, and proposals encouraging such enterprises and structures should be actively promoted to enhance local food production.

Full text:

We ask that the Vale of Glamorgan Council consider protecting existing and potential food growing sites and that there is significant weight attached to protecting the best agricultural land for food growing.

High grade agricultural land must be protected for sustainable agriculture without exception. Paragraph 6.15 of the LDP states that the Spatial Options paper identifies that development opportunities in both Culverhouse Cross and Wenvoe are significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge of both settlements. The growth of towns and cities needs to be set against the need for land to enable Wales to feed itself and become much more resilient to changes. Local Development Plans across Wales must provide policies with this focus and safeguard land for food growing in and around towns and cities. Please see Evidence Pack report on how Wales can feed itself in 2035 here. The Best and Most Versatile (BMV) agricultural land on the edge of Culverhouse Cross and Wenvoe is not a limiting factor for new development it is an opportunity to safeguard land in these locations for food growing. Raising the profile of BMV agricultural land is needed across Wales due to the lack of national guidance when compared to other issues like flooding and housing supply. Our experience is that other local planning authorities in Wales have allowed housing development on BMV agricultural land so further fortification of this core policy is warranted. In responding to the Caerphilly Review of their LDP, Welsh Government most certainly agrees with this approach .
We would also ask that The Council consider including positive policy wording that allows for the potential of SPG on food growing so that food growing enterprises and projects across the area can flourish without being unjustifiably unhindered. Justified development in association with such projects and enterprise should be encouraged because they benefit from minimal permitted development rights and their is still outdated scepticism of their genuine nature. Growers operating on small profit margins, in the early days of their inception find the planning system a barrier to success. Reference to the different types of food growing initiatives should also be included. Narrowly thinking about allotments falls short of the mark and we need to raise the profile of the different types and scales of community food growing that are possible. Referring stakeholders to Social Farms & Gardens for support is advised.

Greenfield land around Culverhouse Cross and Wenvoe should be safeguarded for agriculture and proposals for horticultural initiatives/enterprises, and their essential structures (and potential rural enterprise dwellings) should be explicitly encouraged in this area of the Vale of Glamorgan. The Vale and Cardiff areas are poorly served by horticulture production when compared to other parts of Wales and the catchment opportunities for routes to market are largely untapped yet significant.

Review of the Weight That Is Given to Best Most Versatile (BMV) Land by Local Authorities and National Policy Regulation 15 second review: Welsh Government response to Caerphilly County Council [HTML] | GOV.WALES
Allotments and community gardens | Sub-topic | GOV.WALES

Change suggested by respondent:

Where discussing the best and most versatile agrciultural land at wenvoe and culverhouse cross reference should be made to the opportunity for food growing initiatives (large and small) in this location. Such proposals will be encouraged.

Sound: No
Attachments: None

6174 Object

Document Element: SP2 – SETTLEMENT HIERARCHY
Respondent: Mrs Victoria Tipples [2547]

Summary:

Barry may be the largest town in the Vale, however, the infrastructure can’t handle anymore. The people of Barry feel like we are living in a giant housing estate, the amenities don’t match the size of the town. Yet, now it’s going to increase further. The schools are full, already having to turn away pupils, surgeries are full, Holton Road is not fit for purpose, you have to travel to Cardiff for any decent shops.

Full text:

Barry may be the largest town in the Vale, however, the infrastructure can’t handle anymore. The people of Barry feel like we are living in a giant housing estate, the amenities don’t match the size of the town. Yet, now it’s going to increase further. The schools are full, already having to turn away pupils, surgeries are full, Holton Road is not fit for purpose, you have to travel to Cardiff for any decent shops.

Change suggested by respondent:

No need to build more housing in Barry, look further afield within the Vale.

Sound: No
Attachments: None

6325 Object

Document Element: SP2 – SETTLEMENT HIERARCHY

Respondent: Penllyn Community Council (Clerk) [243]

Summary:

I note that the Deposit RLDP shows no new housing sites in the Penllyn area, though some communities are classified as 'Minor Rural Settlement Areas' and should be eligible for infill and affordable housing. Many rural communities, especially hamlets, are regarded as 'Countryside' without defined boundaries, which restricts their access to community-supported, affordable micro or single-unit developments. The current policies, particularly SSC1 and HG5, exclude around 54 rural communities from such development, contradicting the strategic objectives to support rural housing needs and the Well-being of Future Generations Act (Wales)

Full text:

OBSERVATIONS

a. The Council notes that there are now NO New Housing Developments Sites shown in the Deposit RLDP for the Penllyn Community Council area, although Ystradowen, Penllyn and Craig Penllyn are defined as 'Minor Rural Settlement Areas' and would therefore appear to come within the scope of the of SSC1 and HG5 for infill and affordable housing.

b. However, the remainder of our rural communities are classed as 'Hamlets and Smaller Rural Settlements', have no defined settlement boundaries and for the purposes of Planning Policies are therefore regarded as 'Countryside'.

c. The Deposit RLDP includes over 40 references [see Appendix 1] which include within the stated Strategic Objectives and other statements, recognition of the housing needs of All rural Communities including Hamlets and Smaller Rural Communities and reflects:

i) The need to support to maintain such Communities and to promote the appropriately scaled, affordable development required by such communities to maintain a sustainable demographic balance.

ii) The need to provide appropriate housing within all such rural communities to meet the material needs and wellbeing of both young families and elderly residents.

d. Despite these stated Objectives and supporting comments noted at e above, the proposed Planning Policies set out in the RLDP, particularly those in relation to Development in the Countryside, not only fail to address the requirement/provision of community supported, single unit/ micro developments of appropriate affordable housing, necessary to meet the acknowledged rural need, but in fact actively discriminate against such development outside settlement boundaries.

e. The RLDP thereby excluding some 54 of the 75 Rural Communities within the defined area from effectively address this critical socio-economic issue in a manner which has been historically shown to be not only acceptable but actively welcomed by the vast majority of residents of these hamlets and smaller rural communities.

f. The existing LDP Rural Exception Site Policy and Policy MD10 Affordable Housing Developments Outside Settlement Boundaries provide that:

Small scale affordable housing developments will be permitted outside settlement boundaries where they have a distinct physical or visual relationship with an existing settlement and where it is demonstrated that:

1. The proposal meets an identified local need which cannot be satisfied within identified settlement boundaries.
2. The number of dwellings is in proportion to the size of the settlement.
3. The proposed dwelling(s) will be of a size, tenure and design which is commensurate with the affordable housing need.
4. In cases where the dwelling is to be provided by either a private landlord or the intended occupier, secure mechanisms are in place to ensure the property shall remain affordable in perpetuity; and
5. The development has reasonable access to the availability and proximity of local community services and facilities.

However, the Policies within this RLDP particularly SSC1 and HG5 appear to effectively remove this exception from Hamlets and Smaller rural Settlements without settlement boundaries thereby preventing essential socially necessary development within some 54 of the Vales rural communities.

g. It is noted that much of this conflict between 'Objective and Result', stems from the focus given to Settlement Boundaries within the RLDP. In the document these are only defined for 'Minor Rural Settlements Areas' and not for settlements classed as 'Hamlets and Smaller Rural Settlements'.

h. These classifications arise out of the SETTLEMENT APPRAISAL REVIEW [BP5] which provides an effective rational methodology for a hierarchy of settlement. However, such an appraisal is defined by the many subjective factors, not least the way in which it divides settlements eg City and Llansnnor.

The Appraisal Report itself recognises the limitations of this approach in for example paras: 12.8.5 and particularly 12.8.6 below:

12.8.5 In this respect it is important to note that the use of scoring and ranking methods means that certain socio-economic and environmental factors, which are important in understanding the overall role, function and sustainability of a settlement, are not fully considered by this study. These are generally factors where it is difficult to

attribute a numerical value. Furthermore, it is important to recognise that one of the limitations of using scoring and ranking methods is that certain assumptions and generalisations are invariably used, for example, regarding residents travel to work patterns and the actual use of sustainable transport modes.
12.8.6 Therefore, a strategic assessment such as this one is not intended to be a comprehensive planning assessment of individual settlements or potential development sites within them. Such detailed planning assessments would need to consider the environmental, social and economic issues affecting specific settlements. Decisions on levels of growth and individual proposals will be made as informed planning judgements having considered all other relevant factors.

i. Consequently The Deposited RLDP as it stands neither: designates Settlement Boundaries to allow the relevant proposed Planning Policies to be implemented within these smaller rural Settlements/ Communities; nor does it provide specific Planning Policy/ mechanisms for the provision of managed, Community supported, appropriately scaled, single unit /micro (1-3 units) developments of the affordable housing, suitable for younger families and older residents, necessary to maintain balanced and sustainable Communities in such rural settlements.
By failing to include either or both of the above, the Plan fails to meet its own specific Strategic Objectives set out in the document and therefore also fails to properly address the requirements of the Well-being of Future Generations Act (Wales) 2015 (Well-Being Act)

Change suggested by respondent:

We appreciate the necessity to generating a Settlement Hierarchy and the need to ensure development is controlled in a manner suitable for each level within that. However, we would suggest the conflicts this generates with the overarching Objectives in respect of Sustainable Communities, the Wellbeing of the older and young persons and the wishes of the local communities, can be relatively simply addressed by either:
1. Providing a defined settlement boundary for ALL settlements including 'Hamlets and Smaller Rural Settlements'
The proposed planning polices and constraints notably those in SSC1 and HG5 could then be applied across all existing settlements and communities to allow for appropriate development of affordable homes to meet the aspirations of Para 5.24 and the local Community.

Sound: Not specified

Attachments:

6325- Rep Submission Penllyn Community Council (Clerk) [243] - https://valeofglamorgan.oc2.uk/a/th9
Paper Representation Redacted - https://valeofglamorgan.oc2.uk/a/4sg

6737 Support

Document Element: SP2 – SETTLEMENT HIERARCHY
Respondent: Hallam Land Management [854]
Agent: Savills

Summary:

Hallam are generally supportive of this policy. The continued positioning of St Athan as a Primary Settlement in the third tier of the settlement hierarchy is considered appropriate though clearly the delivery of two Key Sites within St Athan as part of the RLDP has the potential to further elevate its position in the future. This is reflected in Table 10 of Background Paper 5 Settlement Appraisal Review where St Athan is given one of the higher scores of the Primary settlements.

Full text:

1.1. Savills is instructed by Hallam Land ('Hallam') to respond to the consultation on the Deposit version of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').
1.2. Hallam is the strategic land arm of Henry Boot PLC and is one of the UK's most well established and successful land promoters. Hallam operates throughout England, Scotland and Wales from 7 regional offices working with landowners, developers, local authorities, communities and other parties to bring forward development opportunities. Hallam has been in operation since 1990, specialising in obtaining planning permission and delivering development larger schemes including new communities and urban extensions.
Background to Representations
1.3. The Preferred Strategy was published in November 2023. The Preferred Strategy identified "Land West of St Athan" and "Land South of the B4265, St Athan" (Site IDs 456 and 457) as one of five Key Sites in the Preferred Strategy. Both of these sites are under the control of Hallam and were submitted as part of the Call for Sites. A site-specific illustrative masterplan and policy wording were provided under Policy SP4 KS5 (Land to the West of St Athan).
1.4. Hallam submitted representations on the consultation on the Preferred Strategy. These representations were very much supportive of the identification of "Land to the West of St Athan" as a Key Site and the approach that was taken more generally taken in the Preferred Strategy.
Approach to Responding to Consultation
1.5. The VoG has published the Deposit version of the RLDP. The Deposit is the first version of the RLDP to include

emerging allocations, and detailed development management policies, as well as a Proposals Map. It is accompanied by a substantial evidence base which includes various supporting technical documentation submitted as part of the promotion of the allocated sites.
1.6. Building upon the Preferred Strategy, the Deposit RLDP proposes to allocate Land to the West of St Athan as a Key Site. The site is identified under Policy HG1 KS5 (Land to the West of St Athan) as key mixed-use site with capacity for 600 new homes alongside new community and commercial facilities.
1.7. Hallam's representation to this consultation broadly splits into three separate sections:
• It offers general support for the housing requirement, growth strategy and settlement hierarchy. This is covered in Chapter 2 of this Statement;
• It wholly supports the approach of allocating Land to the West of St Athan as part of the Deposit RLDP whilst also providing detailed commentary on the specific wording of Policy HG1 KS5 (Land to the West of St Athan). This is covered in Chapter 3 of this Statement; and
• It provides commentary on a range of development management policies. This is covered in Chapters 4, 5, 6, and 7 of this Statement.
1.8. As well as this Statement, Savills has provided commentary on these specific policies under the VoG's consultation website.

Policy SP1 (Sustainable Growth Strategy), Policy SP2 (Settlement Hierarchy), and Policy SP6 (Housing Requirement)
2.1. Together, these policies have the effect of:
• Setting the housing requirement to be delivered over the RLDP plan period of 7,890 homes with a flexibility allowance applied on top so that provision is made for a total of 8,660 homes. This is the same housing requirement to that included in the Preferred Strategy which was found by Welsh Government to be in conformity with Future Wales (Policies SP1 and SP6);
• Identifying the extent of the Strategic Growth Area as the primary focus of new housing growth. Concentrations of new housing are focussed in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity. St Athan is a specifically named settlement within the Strategic Growth Area (Policy SP1); and
• Identifying St Athan as a Primary Settlement in the third tier of the settlement hierarchy. This is the same tier of the settlement hierarchy as St Athan is in the adopted LDP (Policy SP2).
2.2. Hallam are generally supportive of the aims of these three policies.
2.3. They recognise that the housing requirement has been subject to extensive scrutiny and been found to be appropriate by Welsh Government in response to the Preferred Strategy. In that sense, there is nothing further for Hallam Land to comment upon here other than to note that it should reasonably be seen as the minimum number of homes that the RLDP should be aiming to deliver, particularly following the publication of the 2022-based household projections between Welsh Government's comments on the Preferred strategy and the publication of the Preferred Strategy.
2.4. The strategy – of focussing new housing in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity – is wholly supported. St Athan is clearly already a sustainable location for growth and its sustainability and connectivity have clear potential to enhance alongside further development. The delivery of growth in St Athan is therefore considered to firmly align with the RLDP's strategy.
2.5. The continued positioning of St Athan as a Primary Settlement in the third tier of the settlement hierarchy is considered appropriate though clearly the delivery of two Key Sites within St Athan as part of the RLDP has the potential to further elevate its position in the future. This is reflected in Table 10 of Background Paper 5 Settlement Appraisal Review where St Athan is given one of the higher scores of the Primary settlements.

Policy HG1 KS5 (Land to the West of St Athan)
3.1. Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.
3.2. There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.
3.3. The relevant policy for Land to the West of St Athan is Policy HG1 KS5.
3.4. As a starting point, Hallam wholeheartedly support the allocation of Land to the West of St Athan as a Key Site within the RLDP. Hallam made a comprehensive submission as part of the Call for Sites stage and since then have worked proactively with the VoG and other stakeholders to demonstrate that the site is suitable, deliverable, and viable. It's identification as a Key Site in the Deposit RLDP represents extensive and thorough assessment – its proposed allocated is therefore considered to be sound and firmly evidence based.
3.5. So that the policy functions as effectively as possible, Hallam has a small number of comments and included at Appendix A is a re-worded version of Policy HG1 KS5 which incorporates those changes with text suggested to be removed crossed through and text to be added shown underlined.
3.6. These proposed adjustments are considered in turn below and are structured around the sub-headings that are contained within the policy wording itself.
Site Capacity and Housing Trajectory

3.7. Extensive environmental and technical work has been undertaken by Hallam to support the promotion of the site and the development of a masterplan (and site capacity) that responds to the site's constraints and opportunities.
3.8. That said, Hallam is not a housebuilder and once an outline planning application has progressed, Hallam will identify a development partner (which could be a single or multiple housebuilders / housing associations). Clearly different housebuilders have different house types and differing approaches to density.
3.9. In addition, whilst a lot of technical and environmental work has been undertaken to date, clearly further technical work would be submitted at planning application stage which would further validate the site's capacity.
3.10. Legislative and guidance changes also have the potential to impact a site capacity. Whilst the masterplanning process has been prepared to be SAB compliant, the impact of the introduction of the requirement to secure SAB approval has had an impact on site capacity and it follows that a further, and as yet unknown, legislative or guidance change could have a similar impact.
3.11. This is not to suggest that there isn't a high degree of confidence that the site can deliver roughly 600 homes, rather that Hallam suggest that the word 'approximately' is added to the policy wording to reflect the potential for a degree of deviation (which could be upwards or downwards).
3.12. Background Paper 9A Housing Land Supply and Housing Trajectory sets out the anticipated annual delivery rates for housing over the RLDP. With regards to the ability of the site to deliver the number of homes it is allocated for in the RLDP plan period, the housing trajectory for the site reflects that the first completion date was pushed back from 2027/2028 to 2028/2029 since the consultation on the Preferred Strategy. This means that the whole site continues to be shown as being delivered within the RLDP plan period.
3.13. Hallam support and agree with the approach set out in the Draft Housing Trajectory and see it to be realistic and achievable based on their experience and subject to usual caveats around the condition of the market, RLDP progression, and swift determination of a planning application.
Affordable Housing
3.14. At present, Policy HG1 KS5 (like all of the standalone policies for the other four Key Sites), states that the site should provide a minimum of 210 affordable housing units. This figure is derived from 35% of the number of homes that the site is allocated for (600 homes).
3.15. Worded at present, a strict interpretation of this policy could be that 210 affordable units must be provided onsite regardless of the total number of homes that are proposed. For example, it could be interpreted as requiring a fixed number of affordable homes of 210 homes, even if the total number of homes that are proposed on the site is fewer than the 600 homes that the site is allocated for or, conversely, that only 210 homes should be delivered as affordable if more than 600 homes were to be delivered and the RLDP allocation exceeded.
3.16. Hallam recognise that this is not what the policy wording is seeking to achieve (and their viability work for the site is based on the site delivering 600 homes of which 35% are affordable) but suggest that its wording could be clarified by removing reference to a specific number of affordable homes for the site to deliver in favour of just the affordable housing percentage being noted in the policy.
3.17. Hallam also suggest that the requirement for affordable housing units to not be in clusters of more than 10 homes is removed and that the approach is for this to be considered on a site by site and case by case basis and with recognition that Policy HG5 (Affordable Housing Exception Sites) which can provide a framework for 100% affordable sites of more than 10 homes to be delivered. As an example, and in the case of Land to the West of St Athan, the "Land South of the B4265, St Athan" (Site ID 457) portion of the site is likely better suited to a mixed-use development alongside the future St Athan Railway Sation. This portion of the site is probably better suited to a flatted form of development (either above non-residential uses or as a block) which tend to be delivered as 100% affordable housing developments rather than comprising a mix of private and affordable housing.
Sustainable Transport and Highways
3.18. This part of the policy sets out expectations relating to sustainable transport and highways and there are a number of matters which Hallam wish to comment on.
3.19. As a starting point, Hallam support the delivery of St Athan Railway Station and therefore commits to its safeguarding. Likewise, Hallam recognise the potential suitability for the "Land Between the Railway Line and B4265, St Athan" (Site ID 458) site to accommodate a Welsh-Medium Secondary School and can also therefore commit to safeguarding land for the delivery of a pedestrian and cycle bridge over the railway line. Specific comments on Policy TR1 (Transport Proposals) and Policy CI3 (New Community Facilities) are made elsewhere in this Statement.
3.20. With regards to the Sustainable Transport and Highways section of Policy HG1 KS5, Hallam's overall position is that a careful balance needs to be reached between the policy wording being explicit as to what highway works must be delivered and reserving consideration of this until planning application stage where the exact site capacity is better understood and a full Transport Assessment submitted.
3.21. At present, Hallam's view is that the policy wording is overly explicit and suggest that it could be qualified through the addition of the following text before listing the offsite highways improvements:
'Subject to the Strategic Transport Assessment and site-specific Transport Assessment submitted at planning application stage'.
3.22. Turning to the specific offsite highways measures that are listed within the policy wording, Hallam have four comments.
3.23. Firstly, it is suggested that the delivery of an active travel link along the B4265 between the site entrance and the Gileston Road junction should be secured via a financial contribution that is pooled with KS4 Church Farm. This reflects that the delivery of this link not only links Hallam's site to other services in St Athan but also linking KS4 Church Farm to the services that are proposed and uses for which land is safeguarded within Hallam's site. Clearly this is also to the benefit of existing residents of St Athan. This would reflect the approach that is proposed to be taking for the pooling of Section 106 monies for the delivery of an active travel route between St Athan and Llantwit Major.
3.24. Secondly, Hallam flag the need for the RLDP to be sufficiently flexible with regards to the delivery of an active travel

link between St Athan and Llantwit Major. Ultimately, the purpose of delivering this active travel route would be to provide a connection from St Athan to Llantwit Major Railway Station and the delivery of a Railway Station in St Athan would remove the necessity of delivering this active travel connection. Hallam's suggested amendments to the policy wording seeks to reflect this.
3.25. Thirdly, Hallam have been consistent in highlighting that, whilst there is an aspiration to deliver an improved pedestrian link along Llantwit Road, a combination of the road width and the extent of third party ownerships make delivering a continuous link very challenging with a pragmatic approach instead needing to take place that recognises the ability to deliver betterments but acknowledges that delivering a continuous link is unlikely to be possible. Hallam has suggested additional wording to clarify this.
3.26. Fourthly, Hallam highlight that the designing of a loop road within the site to facilitate access by a bus may be superfluous and represent an over-engineered solution given the potential for the St Athan Transport Interchange that land is safeguarded for under Policy TR1 (Transport Proposals) is envisaged to accommodate infrastructure to accommodate a bus connection. On that basis, it is suggested that the following clause is added to the policy wording to reflect that bus connectivity to the site may be delivered not via an internal bus loop:
'Subject to progress on the St Athan Transport Interchange as land is safeguarded for under Policy TR1 (Transport Proposals)'
Community Infrastructure
3.27. There are three points which Hallam wish to make in connection to this element of Policy HG1 KS5.
3.28. Firstly, Hallam suggest that the wording of the part of the policy relating to financial contributions to fund the delivery of additional school places needs to be adjusted. At present this part of the policy is worded as if there is an automatic requirement to provide Section 106 monies for school places where Circular 13/97 is clear that a contribution should only be sought where the schools do not have current projected capacity to accommodate the new children from the development. Hallam's proposed adjustments seek to ensure that this part of the policy reflects this though note that Background Paper 43 Education forecasts a need for a financial contribution to be made for additional school places at all English and Welsh primary and secondary schools that the site is within the catchment of.
3.29. Secondly, Hallam note that Table 10 of Background Paper 34 Community Facilities identifies an existing over-provision of community space within the St Athan Ward of 778sqm and a surplus of 531sqm of community floorspace at 2036 when the level of housing to be allocated in the Deposit RLDP is delivered. It is understood that this is on the basis of no community floorspace being delivered as part of Hallam's proposals or as part of the KS4 Church Farm site. Hallam suggest that the wording of this element of the policy needs to reflect that community floorspace should only be required to be provided in the case of a local shortage in provision. Aligned to this, Hallam also suggest that the reference to specifically providing a 'community building' is adjusted to instead make reference to 'community space'. This reflects that the community space element of scheme, if indeed it is actually required, could be a part of a larger mixed-use building (probably in the Mixed-Use / Community area) rather than as a standalone building.
3.30. Thirdly, Hallam note the error in the wording of the sixth bullet point under the 'Sustainable Transport and Highways' heading where reference is made to the safeguarding of land on the southern side of the railway line as being identified in Policy CI3(2) where-as it should be Policy CI3(6). This is a minor amendment that should be made to ensure consistency.
Green Infrastructure, Recreation Spaces, and Biodiversity
3.31. The masterplan prepared by PAD Design and submitted by Hallam shows the site delivering a mix of public open space and green infrastructure including the provision of allotments, a Neighbourhood Equipped Area of Play, a Local Equipped Area of Play, and a sports pitch. This is welcomed in Background Paper 32A Green Infrastructure Assessment of Key Sites which, at Paragraph 5.55 recognises that a 'ground up' approach has been taken in the masterplanning approach.
3.32. This is shown indicatively to illustrate the composition of public open space and green infrastructure that the site could provide alongside the other elements of built development that the site is allocated and the masterplan makes provision for.
3.33. Whilst, Hallam recognise the need to provide public open space, the starting point for this should be the Fields In Trust Standards and Hallam therefore suggest an approach where the policy wording is not specific about what forms this should take.

Policy TR1 (Transport Proposals)
4.1. This policy identifies three active travel routes and two public transport schemes that the Deposit RLDP safeguards land for, as well as three highway improvement schemes that are identified as being required to mitigate the impact of development. Two of these are in St Athan – one being the St Athan Transport Interchange for which land is safeguarded for and the second being the Gileston Road Junction which is identified as a required highway improvement. Both are considered in turn below.
St Athan Transport Interchange
4.2. Hallam support the safeguarding of land for the St Athan Transport Interchange and see that its delivery would be to the benefit of the Key Site itself but also more broadly to St Athan and western parts of the VoG.
4.3. It is clear from discussions with Transport for Wales that there is a strong business case for the delivery of a railway station and that the creation of "critical mass" through residential development around it has a key role in driving its delivery, as does the nationally significant economic role that the Bro Tathan Enterprise Zone has and the Aberthaw Green Energy Park will have. The proximity of St Athan to both of these hubs clearly contributes to its fundamental sustainability and suitability for growth whilst the further development of a critical mass of housing and employment generating uses will further support linkages between them and strengthen the business case for a new railway station at St Athan. This is reflected in TFW's 'Today, Tomorrow, Together: A Vision for Rail Across Wales and the Borders' which confirms that the delivery of St Athan Railway Station remains in TFW's pipeline which has been endorsed by the

Westminster Government.
4.4. The location that is identified on the Proposals Map is Transport for Wales' preferred location within the site and has been incorporated into the masterplanning approach which seeks to create a node around it by incorporating a bus interchange and a mix of uses.
4.5. At present, the Proposals Map identifies the location of the Railway Station using a red star which is positioned on the railway line itself but without the required land take not spatially being defined.
4.6. Whilst Hallam recognise that the exact land take required will need to be refined further through discussion with TFW, it may be the case that the mixed-use element on this portion of the site comes forward before the Railway Station.
4.7. The early delivery of these elements should be welcomed as clearly the mixed-use element both enhances the range of services and facilities in St Athan but also would mean that the Railway Station is integrated upon delivery.
4.8. On that basis, it is imperative that the safeguarding of land for the Transport Interchange is limited only to that land required to deliver the Transport Interchange and is done in such a way such the safeguarding does not sterilise non-transport related development from this portion of the site until the Railway Station has been delivered.
Gileston Road Junction, St Athan
4.9. Paragraphs 6.199 and 6.200 relate to the expectation that vehicle trips as a result of RLDP allocations in St Athan are anticipated to trigger the need to upgrade the Gileston Road Junction to a signal-controlled arrangement. This is informed by the conclusions of Table 3 of the Strategic Transport Assessment which forecasts that the junction will be operating above capacity during both the weekday AM and PM peak by the RLDP's end point.
4.10. Hallam note that Technical Note 08 of the Strategic Transport Assessment identifies that the improvements to the Gileston Road Junction are to be delivered by VoG and funded through financial contributions from seven sites that the RLDP proposes to allocate.
4.11. Improvements to this junction are to be funded by a number of sites; however it is unclear whether (and if so, when) forward funding will be secured by the Council and clearly there cannot be a situation where none of the sites can deliver homes until strategic highways works are funded / completed. We therefore seek further clarification over the phasing of these works and note that early delivery of homes ahead of strategic highway improvements is likely to be important for deliverability of each strategic site.
4.12. To respond to Hallam's above comments, one approach could be for references to highway improvement works to be entirely removed from this policy or, if they are to remain, that qualifying text is added to note that the need for and format of any improvements will be subject to detailed consideration at planning application stage and that such contributions must be justified in planning terms, particularly where (in the case of Pen Y Turnpike Road and Waycock Cross for Land to the West of St Athan), the distance from a site and the junction to be improved is significant and therefore thee number of vehicle trips that would be generated modest.
4.13. This aligns with Hallam's suggested approach to the specific wording of Policy HG1 KS5.

Policy CI1 (Open Space Provision)
5.1. This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.
5.2. Hallam note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.
5.3. Hallam is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter.

Policy CI3 (New Community Facilities)
6.1. As well as allocating land for five new or improved education developments, this policy safeguards 'Land South of the Railway Line, St Athan' for the delivery of a Welsh-medium secondary school.
6.2. This policy is clearly of interest to Hallam because Paragraph 6.250 places a requirement for the safeguarding of land on the northern side of the railway line on their Land to the West of St Athan Key Site for a footbridge to land on.
6.3. With the policy wording being intentionally light-touch, Paragraph 6.250 of the Deposit RLDP provides greater detail about the safeguarding of this land (and other paragraphs in the Deposit RLDP relate to other community facilities that Policy CI3 covers). It effectively does two things.
6.4. Firstly, it notes that the delivery of this school will require active travel improvements including the safeguarding of land for a pedestrian and cyclist footbridge over the railway line.
6.5. Secondly, it is clear that the safeguarding of this land is in response to a forecast increase in demand for Welsh-medium secondary school places across the whole of the VoG as a result of expanded capacity at Welsh-medium primary schools across the VoG. On this basis, it follows that this location has been selected as a preferred location because of its ability to serve the wider sub-region.
6.6. Hallam recognise that this site could be a suitable location for a Welsh Medium Secondary School and, as a principle, is agreeable to the safeguarding of land for the footbridge landing on the northern side of the railway line.
6.7. Paragraph 6.250 of the Deposit RLDP is clear that the delivery of a Welsh-Medium secondary school is in response to a regional / sub-regional demand rather than a local need as a result generated either by the development of Land West of St Athan or other emerging allocations within St Athan and it cannot be the case that Hallam are expected to make disproportionate contributions to either the delivery of the school or required active travel improvements just because they have control of the site or that it is next to the Key Site.

Policy CC1 (Residential Operational Net Zero Carbon Development)

7.1. The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) before the policy wording sets out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.
7.2. As a starting point, Hallam share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) can present challenges. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this will result in an uneven framework for housebuilders, significantly adding cost and reducing certainty.
7.3. The justification for using planning policy to set requirements exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.
7.4. There are two points to be made by Hallam here:
7.5. Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage that such an approach would not be sound. This Written Ministerial Statement was subject to an unsuccessful judicial review.
7.6. Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations. Where there are existing Local Plans in England that take this approach, they do not align with the Westminster Government's position and there will be no Local Plans emerging including such policies.
7.7. Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs (Bridgend and Merthyr Tydfil) do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound at Examination stage.
7.8. Secondly, Hallam have concerns with the approach that has been taken with regards to viability.
7.9. From Hallam's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.
7.10. As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated. This is important as it demonstrates that, whilst Hallam do not believe such a policy approach should be taken, the development of the site at the time of the completion of the Development Viability Model for the site is viable whilst meeting the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development).
7.11. Hallam's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. This concern is particularly exacerbated by the fact that, as recognised at Paragraph 6.47 of Background Paper 42 Viability Assessment, takes the lowest estimate for the works required to achieve these policy expectations, Savills' experience – both that of their development land team based in Wales and their environmental sustainability team based across England - is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.
7.12. Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy DNP3 (Glamorgan Heritage Coast)
8.1. This policy relates to the Glamorgan Heritage Coast, identifying a series of land uses that are permissible within the policy area before setting three tests that must be satisfied for development within the Glamorgan Heritage Coast to be permissible where there is an adverse environmental impact.
8.2. Hallam note that the 'Land South of the B4265, St Athan' portion of the land that they control is both proposed to be retained as part of the Glamorgan Heritage Coast (a continuation of the position taken in the adopted LDP) whilst also forming part of the Land to the West of St Athan Key Site where the masterplan at Figure 17 shows it as accommodating the potential new railway station and a mixed-use area (including car parking).
8.3. The relevant extract of the Proposals Map is replicated below:
8.4. The exact composition of the buildings proposed on this portion will require further refinement and will need to be driven by occupier requirements, but the masterplanning work undertaken by pad Design envisages that they could provide a mix of retail and food and drink uses most likely across some or all of the ground floor, alongside workshop, co-working or office incubator space at upper floor levels and perhaps at ground floor level. There could also be the potential for additional homes, likely in the form of apartments at upper floors, as part of a mix of uses. It is realistic therefore to anticipate that this portion of the site will accommodate buildings of up to three or four storeys with a high plot ratio to reflect the uses and supporting infrastructure that it is to accommodate.

8.5. Hallam's position is that the continued inclusion of this parcel of land as part of the wider Glamorgan Heritage Coast is inappropriate for two reasons.
8.6. Firstly, and its most basic level, the approach of allocating the site for development whilst retaining a designation that inherently seeks to restrict the type, form, and quantum of development, is wholly contradictory.
8.7. Designation of this portion of the site as part of the Glamorgan Heritage Coast will mean, given that the uses that Figure 17 envisages as being delivered on the site are not those that the first part of Policy DNP3 (Glamorgan Heritage Coast) allows for, any application for development will need to demonstrate that there is a compelling need for the development, that the benefits outweigh the harm, and that appropriate mitigation measures are in place. This the potential to prejudice its development or, at very least, greatly impact how it is developed whilst requiring.
8.8. Secondly, it is difficult to see how this land warrants ongoing inclusion within the designated Glamorgan Heritage Coast. This is something that is considered in more detail in the Review of Landscape Character and Visual Amenity (December 2022) prepared by FPCR and submitted as part of the Call for Sites (and also available as part of the consultation on the Deposit RLDP as a piece of Key Site Supporting Information). Paragraph 5.13 of the FPCR document concludes on this piece of land that:
'Through the fieldwork it is considered that the Site does not display any "special environmental qualities" identified by the Policy and plays no intrinsic role in the Policy designation, as it is effectively forms a rather ordinary grazing field. It is influenced by the urbanising elements of the adjacent B4265, the Railway Line, the Tarmac Cement works, and to some degree the built edge of St Athan. Furthermore, it is bound and contained by trees and woodland beside the railway line, which prevents wider intervisibility with the coastline.'
8.9. Taking the above together, Hallam suggest that the preparation of the RLDP provides the opportunity to define the extent of the Glamorgan Heritage Coast to respond to both the landscape value of certain sites but also the wider aspirations of the RLDP. If it is not within the gift of VoG to redefine the boundaries of the Glamorgan Heritage Coast through the RLDP then Hallam suggest that an additional element could be added to this policy to confirm that it does not apply to land which is allocated for development.

Appendix A - rewording of Policy HG1 KS5

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3y3

6765 Support

Document Element: SP2 – SETTLEMENT HIERARCHY
Respondent: Persimmon Homes (East Wales) [1068]
Agent: Boyer Planning

Summary:

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

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

Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices

Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.
Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South

Wales Metro and in areas with good bus links.
The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.
In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

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

Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.
Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual
As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be

delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement
From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified "has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area." It also notes that this level of growth has been chosen so that it is "complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).".
Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.
In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.
Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.
Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing

infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.

Policy SSC1 – Development within Settlement Boundaries

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

Policy SP4 – Placemaking

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

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

In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car.

Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.

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

Policy PGD1 – Creating Well Designed and Inclusive Places

Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.

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

Policy PGD2 – Residential Development Densities

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

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

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

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

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

Policy SP5 – Creating Healthy & Inclusive Places and Spaces

Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019

should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private

vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
Loss of Allocated Employment Land
Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
According to the Council's register we understand Site C has not been subject to any formal planning application, and

therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.

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

Policy HG3 – Housing Led Redevelopment Opportunity

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

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

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

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

Policy SP7 – Affordable Housing Provision

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

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

National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.

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

Policy SP8 – Affordable Housing Requirements

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

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

Policy SP10 – Sustainable Transport

Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.

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

improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.
In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
Policy TR1 – Transport Proposals
Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.
In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.
Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.
Policy SP13 – Community Infrastructure and Planning Obligations
Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
Policy CI1 – Open Space Provision
Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.
The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.
Productive and Enterprising Places
Policy CC1 – Residential Operational Net Zero Carbon Development
Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.
Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.
The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.
Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority

areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.

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

Distinctive and Natural Places

Policy SP19 – Green Infrastructure

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

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

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

Policy SP20 – Biodiversity and Ecosystem Resilience

In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Policy DNP1 – Special Landscape Areas

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

Policy DNP2 – Green Wedges

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

Policy DNP8 – Severn Estuary Recreational Pressure

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

The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.

From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could

introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
Conclusion
Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes' most pertinent comments on the consultation document are summarised below:
• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

6819 Object

Document Element: SP2 – SETTLEMENT HIERARCHY

Respondent: Mr Ian Fairweather [1225]

Agent: Boyer Planning

Summary:

The importance of Minor Rural Settlements needs to be carried more strongly forward in the Deposit Plan. Moreover, the evidence base does not sufficiently justify the degree of restriction now applied, nor does it explain why proportionate additional growth in appropriate Minor Rural Settlements would undermine the spatial strategy. As drafted, the policy risks limiting flexibility in the distribution of housing across the Vale. Accordingly, it is considered that the approach to St Nicholas under Policy SP2 is not justified. Clearly there continues to be a disconnect between the identified role and function of St Nicholas, which is supported, and the actual ability to deliver the appropriate range and choice of dwellings in the rural settlements.

Full text:

The Spinney, St Nicholas (Site Ref: 460)
Boyer have prepared the following representation on behalf of Mr Fairweather in response to the current Vale of Glamorgan Replacement Local Development Plan (RLDP) 2021-2036 Deposit Plan Consultation.

A summary of our main representations is as follows:
• Significant concern is raised regarding the lack of residential allocations within the Minor Rural Settlements, in particular St Nicholas.
• Concern regarding the overall housing requirement and the need for an increased flexibility allowance.
• Questions asked regarding the spatial distribution and the lack of other allocations to provide a range and choice of housing.
• Confirmation of the limited constraints for The Spinney, St Nicholas (Site Ref: 460).
• Review of the Candidate Site Assessment; and
• Need to review the Settlement Boundary of St Nicholas.

SP1: Sustainable Growth Strategy
Whilst Policy SP1 outlines the housing delivery requirement (addressed under the response to SP6), the main concern for Mr Fairweather is the proposed primary focus of housing growth within the Vale being within the Strategic Growth Area. Whilst it is understood and supported by Mr Fairweather that new housing developments would be concentrated in locations which are served by existing public transport routes and provide the opportunity to enhance sustainable transport connectivity, it is shortsighted to concentrate this growth specifically along the railway line. The justification being that those settlements identified as being 'Outside of the Strategic Growth Area' – including St Nicholas, are equally as important as those within. St Nicholas is a sustainable location and located on an important public transport route (A48) and is well served by bus transport.

The principle of locating development at sustainable settlement is supported, however Mr Fairweather considered that limiting development at suitable settlements outside the Strategic Growth Area is not the correct approach and that greater flexibility is required to deliver the housing need. Currently under Policies HG1 and HG4, the only allocations in any Minor Rural Settlements amount to 122 dwellings in total (excluding any from St Nicholas). This also needs to be considered in the context of the 1,303 dwellings expected from large and small windfall developments. Clearly there is a requirement to provide further allocations in sustainable Minor Rural settlements identified as being 'Outside of the Strategic Growth Area' – namely St Nicholas.

In context of above, Mr Fairweather strongly recommends that appropriate consideration is given to the widening of the Strategic Growth Areas to include St Nicholas as a sustainable settlement which is capable of accommodating a new allocation at The Spinney (Site Ref: 460).

SP2: Settlement Hierarchy
Mr Fairweather previously supported the identification of St Nicholas as a Minor Rural Settlement and acknowledged its capacity to accommodate proportionate and sustainable growth, particularly given its accessibility and relationship with Cardiff to the east and access to Bridgend to the West. The Deposit Plan retains St Nicholas within the Minor Rural Settlement tier, however, does confirm that the settlement is outside the Strategic Growth Area.

Whilst the overarching principle of directing growth to the most sustainable settlements is supported, the Plan does not clearly demonstrate why settlements that are well connected and functionally related to larger centres, such as St Nicholas, should be subject to such constrained growth.

In this context, Mr Fairweather highlights Paragraph 3.10 which indicates that Minor Rural Settlements provide an 'important range of services and facilities that play a functional role in meeting some of the basic needs of residents within rural areas, reducing the need to travel'.
Building upon this, Policy SP2 does highlight that 'Minor Rural Settlements identified will be limited to the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments'.

Furthermore, the supporting text to Policy SP2 (Paragraph 6.17) confirms that 'those settlements that are considered to have sufficient population, services, and facilities to accommodate small scale growth without it having a detrimental impact on their existing character and local environment'.

This all buildings upon the identified importance of Minor Rural Settlements within the Preferred Strategy which outlined in Paragraph 6.50 that it is 'essential for the LDP to balance the growth in a way that supports the need of rural communities' and whilst it is evident that within these settlements 'general market housing will be limited to opportunities including infill' (Paragraph 6.51), the enabling of an element of 'open market housing will provide opportunities for the delivery of affordable housing reflecting the aspirations of rural communities to sustain their housing needs' (Paragraph 6.51). This importance of Minor Rural Settlements needs to be carried more strongly forward in the Deposit Plan.

Moreover, the evidence base does not sufficiently justify the degree of restriction now applied, nor does it explain why proportionate additional growth in appropriate Minor Rural Settlements would undermine the spatial strategy. As

drafted, the policy risks limiting flexibility in the distribution of housing across the Vale. Accordingly, it is considered that the approach to St Nicholas under Policy SP2 is not justified.

Clearly there continues to be a disconnect between the identified role and function of St Nicholas, which is supported, and the actual ability to deliver the appropriate range and choice of dwellings in the rural settlements. For example, The Spinney, St Nicholas (Site Ref: 460) is considered to naturally round-off the existing boundary, enclosing the envelope of development, without encroaching or sprawling beyond the existing line of built form, in a sustainable location which can accommodate an appropriate allocation.

SP6: Housing Requirement
As per Mr Fairweather's previous comments to the Preferred Strategy, the concerns regarding a need for a higher housing level and the need for development to be appropriate placed in sustainable allocations in a settlement in which people want to live is still relevant.

Currently Policy SP6 establishes the overall housing requirement and applies a 10% flexibility allowance. The Policy suggests that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes and this will be delivered by:
• 3,837 dwellings from the existing land supply
• 3,520 dwellings on allocated sites
• 1,303 dwellings from large and small windfall developments

As per previous representations, Mr Fairweather considers that it's important to take account of recent guidance provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan. For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
More recently in Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery.
Applying the same approach to other current Local Development Plans, it is evident that a flexible housing allowance above the current 10% threshold will be required. Having reviewed the Council's evidence base Mr Fairweather considered that a minimum allowance of 15% would be reflective of the County's growth aspirations and would seek an additional circa 400 dwellings (equating to a housing requirement of 9,074 dwellings inclusive of the 15% flexibility).

To accommodate this increased in flexibility allowance and over all housing numbers, it should be outlined that smaller sites typically deliver more quickly, are less infrastructure-dependent, and increase build-out rates through diversification. The Spinney represents precisely the type of deliverable site that should form part of an enhanced flexibility allowance.

Policy SP6 should therefore be amended to increase the flexibility margin to up to 15%, with consequential allocation of additional small and medium-sized sites.
HG1: Housing Allocations Table 3 spatial distribution
Mr Fairweather does not comment on any of the proposed housing allocations, however, does highlight that the delivery in incumbent upon a number of larger strategic sites, and that to allow a greater range and choice then smaller allocations in the Minor Rural Settlements. Only 161 units are proposed on smaller allocated sites, equating to approximately 7% of newly allocated supply.
In the context of the above, there remains significant concern that the spatial strategy continues to exclude allocations within Minor Rural Settlements, including St Nicholas.

The Plan recognises that Minor Rural Settlements provide an important range of services and facilities and play a functional role in meeting the needs of residents within rural areas. It further acknowledges that it is essential for the LDP to balance growth in a way that supports rural communities. Whilst general market housing is described as being limited to infill opportunities, the Plan also recognises that enabling an element of open market housing provides opportunities for the delivery of affordable housing and helps sustain rural communities.

There is therefore a clear disconnect between the identified role and function of settlements such as St Nicholas and the absence of any allocated sites (excluding the affordable led schemes under Policy HG4) capable of delivering an appropriate range and choice of dwellings. The strategy effectively restricts development to windfall and infill, without positively identifying opportunities that would logically consolidate and strengthen the settlement.

This approach is inconsistent with the settlement's accessibility and functional role. St Nicholas is:
• Well connected to the A48 strategic highway network.

• Served by bus routes within close proximity to the site.
• Within commuting distance of Cardiff and Cowbridge.
• A sustainable and established residential community.

Land adjoining The Spinney, St Nicholas (Site Ref: 460) represents a contained and sustainable opportunity that naturally rounds off the existing settlement boundary. The site encloses the envelope of development without encroaching into open countryside or extending beyond the established line of built form. It is well related to existing services and infrastructure and is capable of accommodating a modest allocation consistent with the scale and character of the village.

A proportionate allocation at this location would align with the stated objectives of supporting rural communities, enabling a mix of market and affordable housing, and providing genuine choice within Minor Rural Settlements. The continued absence of such allocations undermines the internal consistency of the spatial strategy.
Furthermore, the strategy places substantial emphasis on rail-based corridors. Whilst development near rail infrastructure is supported in principle, sustainable growth should not be exclusively rail-led. Strategic highway connectivity and bus accessibility also represent legitimate and sustainable locational advantages.

The complete absence of allocations in Minor Rural Settlements creates an imbalance in distribution and limits housing choice. A modest allocation at The Spinney would represent proportionate growth consistent with the scale and character of the settlement.
HG4 – Affordable Housing Allocations

It is recognised that Policy HG4 does allocate development within some Minor Rural Settlements, but in the context of them being affordable housing led sites where there will be a requirement for the provision of a minimum 50% affordable housing to meet the affordable housing needs of the local community. Mr Fairweather has no objection in principle to this but does object to the fact that there is no development in St Nicholas (despite it being sustainably located on the A48).

Furthermore, The Spinney, St Nicholas (Site Ref: 460) proposes a 40% affordable housing provision which accords with Policy SP8 of the Deposit Plan. Should the Authority consider that the site is suitable for allocation under Policy HG4 then the provision can be amended to 50% to accord with the policy.

Candidate Site Response: The Spinney, St Nicholas (Site Ref: 460)
From a review of the Background Paper (BP18 a) - Candidate Site Assessment at Preferred Strategy Stage, we are aware that the candidate site The Spinney, St Nicholas (Site Ref: 460) has not progressed beyond Stage 2: Detailed Site Assessment: Site Characteristics and Physical Constraints.

The justification provided states that ‘The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area’. Whilst this is disputed and it is considered that the site should have progressed, it is important to highlight that of all the Candidate Sites within St Nicholas, The Spinney has the least issues raised.

Other sites within the assessment raised concerns regarding Best and Most Versatile Land, intrusion into the open countryside and the loss of a sites identified as providing important views. Ultimately, Site Ref: 460, is clearly the most appropriate site for any development within St Nicholas and with limited constraints raised.
Turning to the reasons for not taking the site forward, the following is reiterated in the context of the impact on the character and setting of the Conservation Area.

Conservation Area Impact
St Nicholas is described in the Conservation Area Appraisal and Management Plan as ‘a low density, linear village located on the A48’ and the candidate site is located towards the west of the village and lies partially within the current Conservation Area boundary. The Authority will be aware that the Conservation Area has been amended over the years to its current illogical designation regarding the Paddock area, similar to that of the Settlement Boundary.

The development of the Candidate Site is a clearly a logical and sensible infill development, which would have limited impact upon the Conservation Area. The majority of the site is already hidden from the A48 via mature vegetation and existing boundary features, and any proposed development would maintain this approach and minimise the visual appearance on the Conservation Area.
Listed buildings and other historic buildings of special interest are identified in the Conservation Area Appraisal as ‘County Treasures’. These are situated at the heart of the Conservation Area. The buildings and their settings establish a scale and density for the historic area of the village to the south of St Nicholas’ Church.

More modern development, away from the centre of the village at Ger-y-Llan to the northeast, Dyffryn Close to the southeast and Old Rectory Drive to the west are suburban in character with larger houses and generous gardens. These are all excluded from the Conservation Area and represent development at a lower density than the historic core of the village.

Whilst only a part of the Candidate Site is located within the Conservation Area, it has to be seen in the context of an appropriate infill site that links the southern part of the village with the more modern suburban type of development at

Old Rectory Drive to the west. More significantly, the site provides an opportunity for a development to make a positive contribution to the character and appearance of the Conservation Area as well as respect or enhance the special architectural or historic interest.

This can be achieved by providing a new front boundary to the site and houses with gardens, of the type identified in the Conservation Area Appraisal and Management Plan that help define the character of the village. Whilst the Candidate Site extends to the A48, this is to allow the appropriate minimal access junction, whilst the majority of the generous grass verge will be retained, meaning that development will be clearly set back a considerable distance from the road and the opposite pavement.

Thus, the development will be totally screened when travelling along the A48 and is therefore not considered to affect the views to the north of the site. The development will complement and enhance the character of the rural and built environment surrounding the site.
In line with the objectives of the St Nicholas Conservation Appraisal and Management Plan, the boundary treatments proposed will be sympathetic and in keeping with the surrounding area, such that they do not detract from the historic assets and desired lines of view. Again, whilst detailed design has not yet been progressed, any boundary treatments proposed will avoid the use of stained close boarded timber fencing, over-elaborate modern metal railings and gates. It is reiterated that the building line for the front of the development will not encroach any further forward that the existing boundary and will be designed to be innkeeping and not detract from the existing character of the Conservation Area. Moreover, the layout of the site has been designed in such a way that the spaciousness and green infrastructure is retained and enhanced from a redundant Paddock.

Furthermore, the characteristics that give the Conservation Area its special interest, as identified in the Conservation Area Appraisal and Management Plan have been used as references for the design of the illustrative site layout.

The proposal is to use local materials and design details designed to preserve or enhance the special interest of the Conservation Area. Limestone laid as rubble external walling, slate roofs and roadside walls of varying sizes predominate. More modern houses in the area are rendered and painted white. This, according to the Conservation Area Appraisal gives ‘some cohesiveness [to the area] despite their modern details’.

Elsewhere in the appraisal the village is described as having a ‘rural character’, a character that is reinforced by the existence of mature trees, singularly or in groups and simple pavements with narrow stone curves. The use of modern railings or timber fences are considered to be detrimental to the historic character of the conservation area.

Given the sites relationship with the Conservation Area, the proposal has been designed in to ensure that the development endeavours to protect, preserve and enhance the character of the area.

The site layout has been designed to avoid having the appearance of a suburban estate by providing a range of house types on plots that vary in size thereby maintaining the open structure of the conservation area as described. Furthermore, the existing boundaries to the east and west, which are subject to TPOs, will be retained and enhanced and not detract from the character of the Conservation Area.

The site marks a transition point between the western end of the linear historic core of the village and the lower density development at Old Rectory Drive.
The landscape proposals have been designed to include sustainable drainage, and the tree planting reflects the isolated trees or groups of trees referred to in the Conservation Area Appraisal as significant areas of character.

The illustrative site layout represents an appropriate scale of development and an efficient use of land and as such the proposed development will not have any detrimental impact upon the Conservation Area.
Deposit Plan Amendments
Settlement Boundary

Given the above and the further assessment below, the strong preference would be for the site to be allocated for residential development within St Nicholas. This would form a logical amendment to the Settlement Boundary to include the western parcel (former Paddock) of Candidate Site - The Spinney, St Nicholas (Site Ref: 460). The current Settlement Boundary is illogical as the site is surrounded by development on 3 boundaries and the simple rounding off along the southern boundary would allow for an appropriate windfall infill development.
Conservation Area

Given the above then it is considered that the Conservation Area boundary would need to be amended to reflect the allocation of the site.
These amendments would be required to the Deposit Proposals Map.

Site Assessment
The site was promoted through the Candidate Site process and assessed at Preferred Strategy stage. However, it is not allocated within the Deposit Plan and thus was not subject to updated reassessment as part of this stage of plan preparation.

For completeness, and in order to clearly demonstrate the limited and proportionate nature of the site's constraints, the previous site assessment summary table is reproduced below. This is included to highlight that the site performs favourably in sustainability and deliverability terms, and that the matters previously cited as constraints are capable of mitigation through design.

A table comparing an updated site assessment prepared by Boyer against the Council's assessment has been provided.

This representation, submitted on behalf of Mr Fairweather in response to the current Vale of Glamorgan Council Replacement Local Development Plan (RLDP) 2021–2036 Deposit Plan Consultation, maintains that Land adjoining The Spinney, St Nicholas (Site Ref: 460) represents a logical, sustainable and deliverable parcel that should be allocated as a suitable and viable residential site within the RLDP.

Significant concern remains regarding the absence of residential allocations within Minor Rural Settlements, particularly St Nicholas, and the continued reliance on a limited flexibility allowance under Policy HG1. An increased flexibility margin of up to 15% would necessitate the identification of additional sustainable and deliverable sites. Such growth should be directed, in part, toward appropriate locations within Minor Rural Settlements to ensure a genuine range and choice of housing and to support rural community sustainability.

It is further noted that the site performs favourably in the Council's Candidate Site Assessment, with limited constraints identified. The matters previously raised, including Conservation Area considerations, are capable of sensitive mitigation through design and have been subject to detailed review. There is no substantive evidence demonstrating that the site is unsuitable for development.

Accordingly, the site is considered to represent a suitable, available and achievable allocation capable of contributing to the housing requirement, supporting affordable housing delivery, and reinforcing the spatial objectives of the Plan. The Deposit Plan should therefore be amended to allocate Land adjoining The Spinney, St Nicholas (Site Ref: 460), or alternatively identify it as a reserve or flexibility site, in order to ensure the Plan is justified, effective and deliverable.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/397

6845 Comment

Document Element: SP2 – SETTLEMENT HIERARCHY

Respondent: Taylor Wimpey [386]

Agent: Savills

Summary:

Taylor Wimpey support the conclusions of the Settlement Appraisal Review Background Paper which identifies Sully as a Primary Settlement, reflecting its important role in providing a level of housing growth, in addition to key local services and facilities. Within this Background Paper, Sully is recognised for its vital role as a sustainable community, scoring highly across all key principles in demonstrating its sustainability by providing for the day-to-day needs of its residents. Taylor Wimpey concur with the supporting evidence which reinforces Sully's importance within the settlement hierarchy.

Whilst Draft Policy SP2 presents a 'broad distribution of development within the Strategic Growth Area..', serious concerns continue to be raised around the level of growth around Barry and the emphasis placed on it as the focus for future development. Taylor Wimpey do not dispute the identification of Barry as a Key Settlement, given its position as the largest town within the VoG, however believe Barry should not remain the sole focus for growth where there are opportunities available around primary settlements located within the Strategic Growth Area.

Put another way, it seems perverse for the Deposit RLDP to direct no new growth to a Primary Settlement within the identified Strategic Growth Area.

Full text:

1. Introduction

1.1.1 Savills is instructed by Taylor Wimpey PLC ('Taylor Wimpey') to respond to the consultation on the Deposit Plan as part of the preparation of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').

1.1.2 The submission is made in the context of Taylor Wimpey's position as the promoter of Site ID 376 (Land West of Swanbridge Road, Phase 3). The site is being promoted for a residential development comprising of 260 homes.

1.1.3 Taylor Wimpey is one of the UK's leading national housebuilders, with extensive experience in delivering high-quality residential developments across a wide range of local authority areas. The company has an established presence within the VoG area. Taylor Wimpey is in the process of delivering Phase 1 of the site with development of Phase 2 close

to commencing to dovetail with the completion of Phase 1. Phase 3 would act as a logical extension to the site, effectively rounding off development in this part of Sully and dovetailing with Phase 2 which is anticipated to be completed in 2029.

1.1.4 The site was originally submitted as a candidate site as part of the Call for Candidate Sites stage in September 2022 by Taylor Wimpey. This was a comprehensive site submission demonstrating that the site was viable, deliverable and sustainable – the three tests for Candidate Sites to satisfy as set out in Paragraph 3.36 of the Development Plans Manual. The Candidate Site submission consisted of the following information:

• Archaeological Desk-based Assessment (prepared by RPS);
• Design Vision (prepared by Pegasus Group);
• Drainage Strategy & Flood Risk Assessment (prepared by Pheonix Design);
• Landscape Appraisal (prepared by Pegasus Group);
• Preliminary Ecological Appraisal (prepared by Soltys Brewster);
• High Level Viability Statement (prepared by Savills);
• Transport Technical Note (prepared by Vectos); and
• Supporting Statement (prepared by Savills).

1.1.5 Since then, and on behalf of Taylor Wimpey , Savills have also responded to the consultation on the Preferred Strategy in February 2024 as well as the Housing Growth in Barry consultation in July 2025 and the Housing Trajectory in October 2025.

1.1.6 This supporting statement is structured to initially comment on the approach taken by the VoG in assessing the Land West of Swanbridge Road, Phase 3 site before commenting on specific policies that are contained within the Deposit RLDP.

1.1.7 In general, Taylor Wimpey's position is that, at present, the Deposit RLDP is not sound but that it could be made sound through the amendments as suggested throughout this Statement.

2. Candidate Site Assessment Process and Integrated Sustainability Assessment
Introduction

2.1.1 Candidate sites are in essence assessed through two means – the Candidate Site Assessment Background Papers and the Integrated Sustainability Appraisal.

2.1.2 Taylor Wimpey's position is that both of these documents do not provide an adequate assessment of the Land West of Swanbridge Road, Phase 3 site.

2.1.3 Each is considered in turn below.

Candidate Site Assessment Process

2.1.4 All candidate sites have been assessed at Preferred Strategy stage (reported as Background Paper 18) and Deposit stage (reported as Background Paper 18a).

2.1.5 The reason for the Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site not being carried forward as part of these assessments was presented in Background Paper 18 at the time of publication of the Preferred Strategy with Backgropund Paper 18a providing no further site analysis. The reason for the site not progressing this stage of the Candidate Site assessment process is as follows:

"Development of the site would lead to a loss of the Best and Most Versatile Grade 3a agricultural land contrary to national policy."

2.1.6 Whilst parts of the site do constitute Best and Most Versatile (BMV) land, Taylor Wimpey's position is that there are compelling reasons relating to the site's context and how it is utilised that mean a more nuanced position needs to be taken. Without such nuance, the RLDP risks not allocating a site that, whilst perhaps containing BMV, is otherwise suitable for development and more suitable for development then sites that the Deposit RLDP proposes to instead allocate.

2.1.7 Included at Appendix A, and included as part of Taylor Wimpey's representations on the Preferred Strategy and the Housing Growth in Barry consultations, is an Agricultural Assessment prepared by The Andersons Centre.

2.1.8 The key conclusions from this Assessment are that:

• The site is farmed by a tenant farmer whose main base is approximately 12km away which presents logistical and practical challenges. These challenges are exacerbated by the lack of farm buildings and the fact that there is no mains electricity;

• The site forms part of a wider 230 acre farm and so the cessation of agricultural practices on this parcel will not, by virtue of its size, prejudice the continued farming of the wider land parcel;

• The tenant farmer farms approximately 3,000 acres of land and so the loss of the ability to farm this parcel will have a negligible impact on the continuation of their agricultural operations;

• The site is bound on two sides by existing or permitted housing, on a third boundary by a railway line, and on its eastern boundary by a road; and

• Farming of the land does not support a high level of employment and if the land was lost for development, 0.15 of a full time labour unit's equivalent work would be lost.

2.1.9 Taking the above together, the conclusion needs to be reached that the site's size and context presents challenges for farming and that the development of Phase 2 by Taylor Wimpey has the potential to exacerbate these challenges. Aligned to this, the level of employment that the farming of the site supports is negligible and the cessation of farming of this particular parcel of land will not materially impact either the continued farming operations of the wider farm that the land sits apart of or the tenant farmer that farms the land.

Integrated Sustainability Appraisal

2.1.10 The Initial Integrated Sustainability Appraisal undertaken at Preferred Strategy stage provides a GIS based appraisal of all sites against 17 objectives. Inherently the Initial Integrated Sustainability Appraisal can be a bit of a blunt tool but Taylor Wimpey's position is that the site performs better against a substantial number of the 17 objectives than the current assessment.

2.1.11 Included at Appendix B is an assessment undertaken by Taylor Wimpey which provides commentary against certain objectives and suggests why the site performs considerably better than forecast in the Initial Integrated Sustainability Appraisal.

2.1.12 A summary of this is presented below:
Table 1 Summary of ISA and Suggested Taylor Wimpey Approach

2.1.13 Taylor Wimpey's position here is clear – the inadequacy of the Integrated Sustainability Appraisal as a tool for assessing candidate sites can only be appropriate where the Integrated Sustainability Appraisal is done correctly and considers the mitigation measures that a candidate site submission proposed to put in place. Without this, the Integrated Sustainability Appraisal risks a situation – as Taylor Wimpey suggest has been the case in Policy HG1 KS1 – where a Key Site is selected in favour of alternative sites that are better performing.

3. Deposit Plan

3.1 Introduction

3.1.1 The following section of this Statement comments on the relevant Key Themes, Strategic Objectives and draft Policy Framework forming part of the Deposit Plan Consultation.

3.1.2 The Policy Framework has been reviewed with comments provided on only those policies considered to be of most relevance to Land West of Swanbridge Road (Phase 3), Sully. The position on individual policies contained within the Deposit RLDP are summarised in the table below:

Table 2 Taylor Wimpey Policy Position

Relevant Policy Support or Object
SP1 Sustainable Growth Strategy - Object
SP2 Settlement Hierarchy - Support
SP 6 Housing Requirement - Object
HG1 Housing Allocations: HG1 KS1 – Land at North West Barry - Object
TR1 Transport Proposals: TR1(2) Active Travel Route Sully to Cosmeston - Support
TR1 Transport Proposals: TR1(6) Highway Improvement Works Weycock Cross Roundabout - Object
CC1 Residential Operational Net Zero Carbon Development - Object
CI1 Open Space Provision - Clarity required
DNP5 Environmental Protection - Object as currently worded

3.2 Key Themes and Strategic Objectives

Homes For All

3.2.1 As noted in paragraphs 3.17 and 3.18 of the Deposit Plan the VoG has the highest affordability ratio in Wales with average house prices 9.7 times the average workplace earnings compared to the Welsh average, giving rise to a

significant need for affordable homes which is under significant pressure. This highlights the ever increasing need for sufficient high quality housing, which Taylor Wimpey are committed to provide and supply the mix, type and tenure of housing needed within the local authority's growing population.

Placemaking

3.2.2 Taylor Wimpey embed strong placemaking standards across their developments as detailed within their Placemaking Charter. Taylor Wimpey consider Land West of Swanbridge Road (Phase 3) to present an opportunity to provide a comprehensive residential development that is accessible and well-connected with the existing settlement of Sully and compliments the earlier phases of development. As demonstrated in the earlier phases of development, the Site offers a sustainable location for future growth with easy access to a range of services and facilities in Sully.

Protecting and Enhancing the Natural Environment

3.2.3 Taylor Wimpey support the VoG's commitment to protect and enhance the natural environment through the integration of green/blue infrastructure network and the sustainable management of resources within the VoG. However where Objective 5 seeks to safeguard land from inappropriate development, proposals must be subject to the relevant planning balance giving weight to the surrounding land use and appropriateness of safeguarding agricultural land that would otherwise be unconstrained and considered suitable for development given the outstanding need for housing.

Promoting Active and Sustainable Travel Choices

3.2.4 Taylor Wimpey support the promotion of sustainable travel and active modes of transport, including the provision of designated active travel routes that improve the connectivity between primary and key settlements, such as the Sully to Cosmeston active travel route.

3.2.5 As demonstrated in the earlier phases of Land West of Swanbridge Road, Taylor Wimpey support the promotion of active travel within new developments and provide opportunities for residents to easily engage with active travel.

3.3 Policy Framework

Policy SP1 Sustainable Growth Strategy

3.3.1 Taylor Wimpey's comments on this policy relate to the sustainable growth strategy in so much as it relates to the spatial strategy rather than the housing requirement that the RLDP adopts with further comments on the housing requirement provided in connection to Policy SP6 (Housing Requirement).

3.3.2 Taylor Wimpey appreciate the need to balance the ten strategic objectives against the need for growth and protection of the VoG's natural and built environment, and strongly support the strategic objective to provide homes for all. Taylor Wimpey maintain their position on the proposed growth strategy that has been established within earlier consultation responses submitted throughout the RLDP process, including the most recent consultation on 'Growth Options in Barry'.

3.3.3 Taylor Wimpey consider that to date the growth strategy has placed disproportionate emphasis on identifying an alternative site within Barry, rather than giving due consideration to potential sites in nearby high-performing settlements such as Sully. Taylor Wimpey therefore strongly encourage the VoG to widen the search for additional allocations beyond the administrative boundary of Barry Town Council and to consider locations that represent a logical and sustainable extension to neighbouring primary settlements that are located within the Strategic Growth Area, including Sully.

3.3.4 The six key elements of the Sustainable Growth Strategy are noted and Taylor Wimpey support a spatial strategy that locates major new development for the delivery of sustainable housing growth in appropriate locations, such as Sully, that are supported by the relevant infrastructure, services and facilities. Providing new homes within Phase 3 aligns with the Strategic Growth Area identified within the RLDP Strategy which forms the primary focus for housing growth.

3.3.5 Policy SPG1 continues to identify Sully as a location where new housing development will be concentrated, therefore establishing a principle of development for Phase 3 and help to further align the provision of new housing with the existing facilities of Sully, reducing the need to travel. Sully represents an inherently sustainable location for future growth and aligns well with the Sustainable Transport Oriented Growth Option. As identified in the Deposit RLDP, Sully is classified as a Primary Settlement and performs a complementary role to Barry as a key centre. Its position within the Strategic Growth Area further indicates that an appropriate level of development at Sully would be acceptable, with both existing housing delivery and the current allocation at Swanbridge Road supporting its established role.
3.3.6 With existing development ongoing to the north of the Site, at Phases 1 and 2 of Land West of Swanbridge Road, Phase 3 is considered to provide an appropriate level of growth in a sustainable location that would form a logical extension to existing allocations. The sustainability and suitability of Sully to accommodate residential development is reinforced by the allocation of 500 dwellings under Policy MG2(37) ('Land West of Swanbridge Road, Sully') on land directly north of the site promoted by Taylor Wimpey. The progression of this location into a phase 3 development would continue to strengthen Sully's function as a primary settlement and would constitute a logical and coherent extension to

the existing built form.

Figure 1 Extract of Growth Strategy

3.3.7 Taylor Wimpey appreciate the aspirations of the Council to deliver housing to meet the identified future housing needs of the VoG and wider growth aspirations of the South East Wales Region at a strategic level. Taylor Wimpey support the revised strategy moving away from North East Barry, however maintain the position that this level of growth should be re-allocated to those locations that are most suitable for growth, including sustainable settlements outside of Barry. Growth should not be focuses solely on Barry.

Policy SP2 Settlement Hierarchy

3.3.8 Taylor Wimpey support the conclusions of the Settlement Appraisal Review Background Paper which identifies Sully as a Primary Settlement, reflecting its important role in providing a level of housing growth, in addition to key local services and facilities. Within this Background Paper, Sully is recognised for its vital role as a sustainable community, scoring highly across all key principles in demonstrating its sustainability by providing for the day-to-day needs of its residents. Taylor Wimpey concur with the supporting evidence which reinforces Sully's importance within the settlement hierarchy.

3.3.9 Whilst Draft Policy SP2 presents a 'broad distribution of development within the Strategic Growth Area..', serious concerns continue to be raised around the level of growth around Barry and the emphasis placed on it as the focus for future development. Taylor Wimpey do not dispute the identification of Barry as a Key Settlement, given its position as the largest town within the VoG, however believe Barry should not remain the sole focus for growth where there are opportunities available around primary settlements located within the Strategic Growth Area.

3.3.10 Put another way, it seems perverse for the Deposit RLDP to direct no new growth to a Primary Settlement within the identified Strategic Growth Area.

Policy SP 6 Housing Requirement

3.3.11 The purpose of this policy is to set the housing requirement and then identify the components of supply that are anticipated to meet this housing requirement. A number of Background Papers (nos. BP7, BP8, BP8A, ad BP9A) underpin the approach that is taken. Taylor Wimpey have a number of comments to make on the approach taken in this policy.

Housing Requirement

3.3.12 The approach taken in the Deposit RLDP, as with the Preferred Strategy beforehand, is for the housing requirement to make use of a 10 year dwelling-led scenario, an approach that reflects past completions and looks to extrapolate this forward over the lifetime of the RLDP.

3.3.13 Taylor Wimpey provided detailed commentary on the proposed housing requirement in their comments on the Preferred Strategy but note that Welsh Government have subsequently provided their comments on the Preferred Strategy raising no objection with the housing requirement proposed to be taken.

3.3.14 Taylor Wimpey's position though remains – if a dwelling-led scenario is to be used to determine the housing requirement then it needs to have a far shorter scenario length then 10 years as the first three years of the 10 year period selected were when supply was suppressed as a result of the current LDP not having been adopted.

3.3.15 That said, there is a clear contextual change since the Preferred Strategy was adopted, this being the publication of the 2022-based household projections have been published. Table 5 of Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections provides a comparison of the 2022-based projections with the 2018-based projections and the Deposit RLDP's housing requirement. A simplified version of this table is shown overleaf:

Table 3 RLDP Housing Requirement
Scenario Housing Requirement
RLDP 7,587
2018-based projections 6,214
2022-based projections 9,623

3.3.16 This is important as Paragraph 4.2.6 of PWW states that:

'The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans.'

3.3.17 The proposed approach of continuing to use the 10 year dwelling-led scenario, as a methodology, clearly does not do this.

3.3.18 The approach of using the 2022-based household projections would comply with the aspirations of PPW. Taylor Wimpey's position is that the commentary provided in the Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections for not using 2022-based projections is wholly inadequate and that these projections should be used.

Flexibility Allowance

3.3.19 Paragraph 5.58 of Edition 3 the Development Plans Manual (March 2020) makes it clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes the RLDP should plan for. This is in the interest of ensuring that sufficient housing is delivered in the event of some allocated sites either not delivering in their entirety or delivering less homes than anticipated. Paragraph 5.59 of the Manual clarifies that the extent of the flexibility allowance should be informed by local issues with 10% as a starting point (i.e. as the minimum).

3.3.20 The Adopted Local Development Plan (ALDP) applies a 10% flexibility allowance on top of the housing requirement for 9,460 homes so that provision is made for 10,408 homes.

3.3.21 Paragraph 1.2.34 of the Annual Monitoring Report 2024-2025 provides a comparison of the number of homes that have been completed and the level of completions that the ALDP anticipates. This shows that 6,999 homes have been delivered up to 1st April 2025 against a cumulative dwelling target of 8,829 homes, representing a shortfall of 20.7%.

3.3.22 Taylor Wimpey's point here is that the ALDP's flexibility allowance of 10% is insufficient to ensure that the ALDP's housing requirement is actually being delivered. This is clear evidence that a higher flexibility allowance should be used for the RLDP. Although for different reasons, but following a direction from the Welsh Government Planning Inspector, Bridgend County Borough Council has increased its flexibility allowance to 20% and, it is considered that such a buffer is appropriate for the VoG's RLDP.

Non-Delivery Allowance on Land Bank

3.3.23 Line C of Table 2 of the Preferred Strategy relates to those sites that either benefit from planning permission or are subject to a resolution to grant planning permission subject to planning permission. Combined, these sites are identified as having capacity for 1,860 homes.

3.3.24 The current approach, which assumes that all other sites which are under construction or sites where there is either a planning permission in place or sites where there is a resolution to grant planning permission subject to the signing of a Section 106 agreement will be completed in full, causes concern for Taylor Wimpey.

3.3.25 There are multiple reasons why homes that benefit from either planning permission or a resolution to grant planning may not be delivered. These relate to viability, but also to specific site constraints and landowner intentions.

3.3.26 A point that is separate, but inherently linked, to the above is that often the capacity of a site for which reserved matters approval is sought is less than that permitted at outline stage. Requirements for SAB approval and the demonstration of a biodiversity net benefit, for example, reduce the capacity of a site at detailed design stage but are often not factored in at outline stage, particularly where the outline application is not progressed by a housebuilder.

3.3.27 Research undertaken by the Local Government Association for England (no such data is available for Wales) suggests that, between 2010/2011 and 2019/2020 a total of 2,782,300 dwelling were granted planning permission whilst there were only 1,627,730 completions. This means that during this period just 58.5% of those homes which were granted planning permission were completed.

3.3.28 Taylor Wimpey is not suggesting that applying a discount of 41.5% is necessarily correct and the above is both from England and a few years out of date but the need for a discount that relates specifically to Line C is very clear.

3.3.29 It's difficult to know what this figure should be but Taylor Wimpey suggest that a 20% figure is used to reflect the flexibility allowance.

Windfall Allowances

3.3.30 The approach taken in the Deposit RLDP is to assume that 1,303 homes will be delivered across Windfall Sites. This has been calculated on the basis of previous completion delivered as windfalls.

3.3.31 Taylor Wimpey's concern is that the delivery of homes on Windfall Sites inherently becomes more challenging over time as the easier to develop sites have been delivered and the buildings and land that hasn't been developed is subject to increasing levels of policy protection. The approach taken by Cardiff Council in their Deposit RLDP is to assume that 75% of the 10 year average Windfall Sites will be delivered and such an approach seems entirely appropriate in this case.

3.3.32 An Urban Capacity Study (October 2023) prepared by the VoG, seeks to corroborate this by identifying 2,627

homes that could be delivered across the VoG. Whilst the windfall allowances would be less than the suggested urban capacity, this shouldn't be seen as problematic or as a conflict as the purpose of the Urban Capacity Study is, as the name suggests, just to identify sites which may have capacity. It doesn't account for land ownership (and whether the land owners have aspirations to dispose of the site) or development viability. In addition, the approach taken to site capacity to is to assume a density based on site type but it does this without an appreciation of site constraints and is based on the gross rather than net area.

Rolled Forward Sites

3.3.33 Taylor Wimpey have concerns with the approach that is taken in Table 2 of the Deposit RLDP which identifies allocations for 959 homes that are to be rolled over from the ALDP to the RLDP.

3.3.34 Concerns are raised around two sites in particular - Land to the west of Pencoedtre Lane, Barry and Land between new Northern Access Road and Eglwys Brewis Road, These sites are allocated in the ALDP but have failed to be delivered. Given the longstanding period during which there has been clear policy support for development but no completions, it follows that there are serious concerns around the deliverability of these two sites which, together, are allocated for 370 homes.

3.3.35 The failure to deliver these dwellings is due to a number of factors which are detailed in Taylor Wimpey's Preferred Strategy consultation response, which questions whether these sites will deliver at all or at a significantly reduced capacity due to the following reasons:

- Viability constraints;
- Site specific constraints;
- Landowner intentions;
- Requirements for SAB approval; and
- Biodiversity net benefit;

3.3.36 Whilst it is recognised that there may be policy support for the delivery of these two sites, there deliverability is clearly uncertain and they should be removed from Table 2.

Conclusion

3.3.37 The following table summarises the approach previously proposed in the Deposit RLDP and compares it to the amendments suggested by Taylor Wimpey in the preceding sections of this Statement.

Table 4 Deposit RLDP Housing Supply and Taylor Wimpey's Suggested Approach

Housing Supply - Deposit Plan (December 2025)	Taylor Wimpey Suggested Approach (March 2026)
Housing Requirement	7,890	9,623
Flexibility Allowance	10%	20%
Flexibility Allowance –	770	1,925
Housing Requirement + Flexibility Allowance	8,660	11,548
A – Completions	1,747	1,747
B – Units Under Construction	313	313
C and D- Units with Planning Permission Minus Non-Delivery Allowance	1,777	1,488
Existing Supply	3,827	3,548
E – Large Windfall Sites	720	540
F – Small Windfall Sites	583	438
E+ F Total Windfall Allowance	1,303	978
RLDP Allocations	3,520	3,150

3.3.38 The conclusion reached in Taylor Wimpey's analysis is that, as a result of both the suggested housing requirement and flexibility allowance combined with Taylor Wimpey's comments on the components of supply, the Deposit RLDP needs to find allocations to deliver a further 3,872 homes.

Policy HG1 KS1 – Land at North West Barry

3.3.39 Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. Taylor Wimpey has provided comments on the housing requirement that is set in the RLDP and the components of supply that are anticipated to meet it in the proceeding sections of this Statement.

3.3.40 As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.

3.3.41 There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered

and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.

3.3.42 Policy HG1 KS1 proposes to allocate the site known as 'Land at North West Barry'.

3.3.43 The proposed allocation of this site follows a consultation – entitled 'Housing Growth in Barry' - undertaken by the VoG in July 2025 which proposed to allocate three sites in Barry as an alternative to the North East Barry site that was identified as a Key Site in the Preferred Strategy but was considered to no longer be deliverable.

3.3.44 Taylor Wimpey responded as part of the 'Housing Growth in Barry' consultation, supporting the removal of North East Barry as a Key Site but raising serious concerns with the proposed allocation of 'Land at North West Barry' as an alternative.
3.3.45 These concerns remain and Taylor Wimpey strongly consider there need to be other alternative sites – such as Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) - within nearby settlements that perform better than the Land at North West Barry site and should be allocated for housing.
3.3.46 To support this conclusion, Taylor Wimpey has undertaken a review of the Integrated Sustainability Appraisal (ISA) which provides a scoring of different candidate sites against the 17 objectives as well as considering and comparing the sustainability and accessibility of the two sites.

Integrated Sustainability Appraisal

3.3.47 The below table provides a comparison of how the Integrated Sustainability Appraisal scores Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) compared to the Land at North West Barry site. Two different comparisons are provided – one which compares the actual scoring in the ISA and a second which compares the two sites following Taylor Wimpey's suggested scoring which is included as Appendix A.

3.3.48 These tables clearly highlight where the subject site out performs North West Barry across numerous objectives.

Table 5 Comparison of Phase 3 Land West of Swanbridge Road (Site ID 376) and North West Barry (Site ID 490) ISA performance

3.3.49 From an initial review, the Integrated Sustainability Appraisal shows that Land West of Swanbridge significantly outperforms North West Barry in terms of the number of significantly positive scores '++' and the number of '—' scores. To this end the subject site provides clear advantages above and beyond North West Barry in terms of homes, health, and transport. As such Land West of Swanbridge is considered to have the capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge; The site is within 800m of a health service and an active travel route; and, The site is within close proximity (≤800m) to a railway station or bus stop, town/ retail centre and an active travel route. Taylor Wimpey consider this assessment should go further to recognise the associated benefits to the leisure than be provided by the site's development.

3.3.50 Following Taylor Wimpey's re-assessment of the site against the Integrated Sustainability Appraisal ISA objectives it is also considered to obtain notably more positive '+' scores than North West Barry. It is also worth noting that North West Barry has more unknown impacts than Land West of Swanbridge which introduces a level of uncertainty around its potential for further negative impacts. Moreover, North West Barry scores a significant number of negative impacts across the ISA, with the extension site obtaining double the amount than Land West of Swanbridge Road.

3.3.51 Taylor Wimpey's position is that it would be unsound to allocate a site that performs considerably poorer in the Integrated Sustainability Appraisal than a site that is not proposed to be allocated.

Accessibility and Sustainability

3.3.52 SLR Consulting have prepared an updated document demonstrating the Site's sustainability credentials and providing a detailed overview of existing and future active travel and public transport infrastructure. This is included as Appendix C.

3.3.53 As a starting point, it considers those services within Sully. In terms of local amenities, the population size of Sully, naturally benefits from a good range of local amenities and services, and therefore it is anticipated that a high proportion of future residents' day-to-day journeys would be contained within the village and undertaken via walking or cycling. The Walking Catchment Map prepared by SLR demonstrates this and illustrates services within walking distance from the Site.

3.3.54 The proposed development benefits from local existing and future / planned infrastructure which will help support travel by sustainable modes such as walking, cycling and public transport. The Site falls within the less than 15 minutes Public Transport Catchment for bus and rail services. The Site is supported by the existing bus network, connecting Sully with Barry, Penarth and Cardiff – the nearest bus stop approximately 400m from the centre of the site; Moreover the Site is within proximity to Cadoxton and Penarth railway stations which have regular services in each direction in addition to the existing walking and cycling infrastructure in and around Sully.

3.3.55 The future accessibility of the Site will be further enhanced through the ongoing and planned South Wales Metro improvements, future active travel routes and the proposed Sully to Penarth mixed use link. The below figure shows several newly proposed active travel routes running close to the site including a new walking / cycling route along Swanbridge Road. Planning applications are now being submitted to support the delivery of these new active travel links. In March 2025 a planning application was submitted proposing a new route between Palmerstown and Dinas Powys.

3.4 SLR have undertaken further assessment work comparing the sustainability credentials of Land West of Swanbridge Road to Land North West of Barry. Land North West of Barry, is separated from the existing built-up area by the B4266 Pontypridd Road where the eastern and southern boundaries abut residential properties. As such, the proposed access for all modes would be taken from the A4226 Port Road West. The A4226 and B4266 can be a barrier to the promotion of active travel in that they facilitate vehicular travel and do not provide an attractive environment for pedestrians.

3.5 Furthermore, Land North West of Barry is on the fringes of Barry and had few if any facilities within a 10 minute walk, other than bus stops. In comparison, Land West of Swanbridge Road in Sully benefits from its proximity to the High Street in Sully and the services there.

3.6 The below table demonstrates differences in accessibility to amenities between the two sites, where Land West of Swanbridge Road presents a more favourable location for future development.

Table 6 Comparison of Local Facilities Between Land North West of Barry (Site ID 449) and Land West of Swanbridge Road (Phase 3) (Site ID 376)

3.7 Whilst the walking distance shown from Land North West of Barry to the nearest bus stop is slightly less than the Swanbridge Road Site, it should be noted that the bus services that can be accessed from Sully are more frequent and more direct than those which can be accessed from Land North West of Barry.

Conclusion

3.8 Taking the above together, the conclusion Taylor Wimepy reach is that their Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site performs more strongly than the Land North West of Barry site.

Policy TR1 Transport Proposals

3.9 The draft transport proposals contained within the Deposit RLDP have been reviewed with the following proposals considered to be pertinent to the Site and draft residential allocations.

TR 1 (2) Active Travel Route: Sully to Cosmeston

3.10 Taylor Wimpey support the designation of an active travel route connection the eastern side of Sully with Cosmeston in the north-east. Most notably the proposed route will pass Swanbridge Road which provides direct access to Land West of Swanbridge Road Site, with Phase 3 in close proximity to the travel route. The proposal would further enhance the accessibility and sustainability of the Site as a logical extension for residential development in Sully.

Figure 4 Extract of Deposit RLDP Proposals Map with Land West of Swanbridge Road (Phase 3) Identified

TR1 (6) Highway Improvement works: Weycock Cross Roundabout, Barry

3.11 Taylor Wimpey raise concerns around the proposed works at the Wyecock Cross Roundabout, compared to the other improvement works proposed. As noted in the Deposit RLDP, this roundabout forms a key connection within the wider strategic highway network and therefore of high importance for the local area and surrounding communities. The proposed options presented within the Deposit RLDP provide little certainty of the scope of works required with no preferred option identified. This raises concerns around the impacts of the highway improvements on the deliverability of the adjacent draft allocation of North West Barry. The same concerns arise when considering the roundabout improvement works in combination with the proposed access strategy contained within North West Barry's supporting information package. The proposed road widening measures (c.11m increase) required to make the draft allocation accessible would have a significant impact on the wider transport network at this strategic junction.

Policy CC1 (Residential Operational Net Zero Carbon Development)

3.12 The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) then setting out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.

3.13 As a starting point, Taylor Wimpey share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) is not appropriate. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this results to an uneven framework for housebuilders, significantly adding cost and reducing certainty.

3.14 The justification for exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.

3.15 There are two points to be made here:

3.16 Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage. This Written Ministerial Statement was subject to a judicial review which was dismissed with the position taken in it found to be legally sound.

3.17 Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations.

3.18 Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound.

3.19 Secondly, Taylor Wimpey have concerns with the approach that has been taken with regards to viability.

3.20 From Taylor Wimpey's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.

3.21 As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated.

3.22 Taylor Wimpey's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. Savills' experience is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.

3.23 Taylor Wimpey's other concern with this approach is that the figure assumed as being required to achieve the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is driven from a Cost Assessment report published in January 2024. With the Background Paper 9A Housing Land Supply and Housing Trajectory not forecasting first completion onsite until 2028/2029, there is likely to be a period of approximately five years from the establishment of the figure for delivering the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) and when the first units would be delivered onsite.

3.24 Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy CI1 (Open Space Provision)

3.25 This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.

3.26 Taylor Wimpey note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.

3.27 Taylor Wimpey is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter, Policy DNP5 Environmental Protection

3.28 Taylor Wimpey consider the inclusion of 'the loss of the best and most versatile agricultural land' to be at odds with the other elements listed, where unlike the others mentioned, the loss of agricultural land would have limited, if any, impact on people, residential amenity and property.

3.29 It is acknowledged that the loss of BMV agricultural land may impact the VoG's overall amount of high quality agricultural land, however this should be assessed against the existing high level of BMV agricultural land within the County. The extent to which its loss is considered "unacceptable" should be subject to the planning balance against the overriding need for affordable housing and local housing need. Consideration towards the farming business case and economic viability are also required within the planning balance. In the case of Land West of Swanbridge Road, the loss of BMV agricultural land remains the only constraint that cannot be overcome, as noted in the Candidate Site Assessment. Whilst the loss of high quality agricultural land should be avoided, Taylor Wimpey consider that where the merits of the Site are overwhelmingly in favour for sustainable residential development in a suitable and logical location, Policy DNP5 should not stand in the way of housing delivery.

3.30 Whilst Taylor Wimpey support the clause within the draft policy: "Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the impact identified to an acceptable level. Planning conditions may be imposed, or legal obligation entered into, to secure any necessary mitigation and monitoring processes." However, in the context of BMV agricultural land, it is not clear how the mitigating measures, in the form of planning conditions or legal obligations, can be applied. This reinforces the earlier view that the inclusion of 'the loss of the best and most versatile agricultural land', as currently worded within the draft policy, is at odds with the other elements listed where mitigation strategies for pollution can be suitably conditioned.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Redacted Deposit Representation Form - https://valeofglamorgan.oc2.uk/a/3c8
Redacted Candidate Site Rep Form - https://valeofglamorgan.oc2.uk/a/3c9
Redacted Candidate Site Rep Form 2 - https://valeofglamorgan.oc2.uk/a/3cv
Redacted ISA HRA Representation Form - https://valeofglamorgan.oc2.uk/a/3cb
Redacted Supporting Evidence - https://valeofglamorgan.oc2.uk/a/3g5

6859 Comment

Document Element: SP2 – SETTLEMENT HIERARCHY
Respondent: Mr Andrew Raymond [1170]
Agent: Boyer Planning

Summary:

Support for the identification of Colwinston as a Minor Rural Settlement and acknowledgement of its capacity to accommodate proportionate and sustainable growth. However, the Plan does not clearly demonstrate why settlements that are well connected and functionally related to larger centres, such as Colwinston, should be subject to such constrained growth.

There continues to be a disconnect between the identified role and function of Colwinston, which is supported, and the actual ability to deliver the appropriate range and choice of dwellings in the rural settlements. A modest allocation in Colwinston (Candidate Site 409) would represent proportionate growth that reflects the scale and character of the settlement. The current approach within Policy SP2 risks constraining flexibility within the spatial strategy and limiting opportunities to support sustainable rural communities.

Full text:

Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409)
Boyer have prepared the following representation on behalf of Andrew Raymond regarding their land interests associated with Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) in response to the current Vale of Glamorgan Replacement Local Development Plan (RLDP) 2021– 2036 consultation.

A summary of the main representations are as follows:
• Concern regarding the absence of proportionate residential growth opportunities within rural settlements such as Colwinston;
• Concern regarding the overall housing requirement and the need for an increased flexibility allowance within the housing trajectory;
• Questions regarding the spatial distribution of development and the limited range and choice of sites outside the Strategic Growth Area;
• Confirmation that Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) represents a logical and sustainable opportunity for modest residential development;
• Review of the Candidate Site Assessment process and the current status of the site within the Candidate Site Register; and

• The need to consider appropriate settlement boundary adjustments to facilitate proportionate growth in sustainable rural settlements.

SP1: Sustainable Growth Strategy
Whilst Policy SP1 outlines the housing delivery requirement (addressed under the response to SP6), the principal concern in relation to the site promotion is the concentration of the majority of future housing growth within the defined Strategic Growth Area.
It is understood and supported that new housing development should be located in sustainable locations with access to public transport and services. However, the approach adopted within the RLDP places an overly narrow emphasis on growth within the Strategic Growth Area, primarily focused along rail corridors. This approach risks overlooking other sustainable rural settlements which also demonstrate appropriate connectivity and capacity to accommodate proportionate growth.

Settlements outside the Strategic Growth Area continue to perform an important role within the Vale's settlement hierarchy and rural economy. Villages such as Colwinston provide an established residential community and contribute to the vitality and sustainability of rural areas. Restricting opportunities for modest growth within such settlements risks undermining the long-term sustainability of rural communities.

The principle of directing development to sustainable settlements is supported. However, limiting development opportunities exclusively within the Strategic Growth Area is not considered to represent the most balanced or flexible spatial strategy. Greater flexibility should be introduced to allow appropriate small-scale allocations within sustainable rural settlements.

In this context, Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) represents a sustainable opportunity for a modest residential development that would align with the scale and character of the settlement. The site lies adjacent to existing built form and would represent a logical and contained extension to the village.
SP2: Settlement Hierarchy

Mr Raymond supports the identification of Colwinston as a Minor Rural Settlement and acknowledged its capacity to accommodate proportionate and sustainable growth, particularly given its accessibility and relationship with Bridgend to the west and Cowbridge, Barry and Cardiff to the east. The Deposit Plan retains Colwinston within the Minor Rural Settlement tier, however, does confirm that the settlement is outside the Strategic Growth Area.
Whilst the overarching principle of directing growth to the most sustainable settlements is supported, the Plan does not clearly demonstrate why settlements that are well connected and functionally related to larger centres, such as Colwinston, should be subject to such constrained growth.

In this context, Mr Raymond highlights Paragraph 3.10 which indicates that Minor Rural Settlements provide an 'important range of services and facilities that play a functional role in meeting some of the basic needs of residents within rural areas, reducing the need to travel'.
Building upon this, Policy SP2 does highlight that 'Minor Rural Settlements identified will be limited to the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments'.

Furthermore, the supporting text to Policy SP2 (Paragraph 6.17) confirms that 'those settlements that are considered to have sufficient population, services, and facilities to accommodate small scale growth without it having a detrimental impact on their existing character and local environment'.

This all building upon the identified importance of Minor Rual Settlements within the Preferred Strategy which outlined in Paragraph 6.50 that it is 'essential for the LDP to balance the growth in a way that supports the need of rural communities' and whilst it is evident that within these settlements 'general market housing will be limited to opportunities including infill' (Paragraph 6.51), the enabling of an element of 'open market housing will provide opportunities for the delivery of affordable housing reflecting the aspirations of rural communities to sustain their housing needs' (Paragraph 6.51). This importance of Minor Rural Settlements needs to be carried more strongly forward in the Deposit Plan.

Moreover, the evidence base does not sufficiently justify the degree of restriction now applied, nor does it explain why proportionate additional growth in appropriate Minor Rural Settlements would undermine the spatial strategy. As drafted, the policy risks limiting flexibility in the distribution of housing across the Vale. Accordingly, it is considered that the approach to Colwinston under Policy SP2 is not justified.

Clearly there continues to be a disconnect between the identified role and function of Colwinston, which is supported, and the actual ability to deliver the appropriate range and choice of dwellings in the rural settlements. For example, a modest allocation at Land adjacent to Waterton Lodge, Colwinston (Candidate Site 409) would represent proportionate growth that reflects the scale and character of the settlement. The site sits adjacent to existing development and would consolidate the existing settlement pattern without resulting in sprawl into the open countryside.

The current approach within Policy SP2 risks constraining flexibility within the spatial strategy and limiting opportunities to support sustainable rural communities.

SP6: Housing Requirement
Concerns are raised regarding the overall housing requirement and the level of flexibility incorporated within the Plan.

Policy SP6 currently establishes a housing requirement of 7,890 dwellings over the Plan period and includes a flexibility allowance of 10%, resulting in an overall provision of 8,660 dwellings.
The proposed supply is anticipated to be delivered through:
• 3,837 dwellings from the existing land supply
• 3,520 dwellings on allocated sites
• 1,303 dwellings from large and small windfall developments
Whilst the inclusion of a flexibility allowance is supported, it is considered that a 10% allowance may not be sufficient to ensure resilience within the housing trajectory.
Recent experience from other Local Development Plans across Wales has demonstrated the importance of incorporating higher flexibility allowances to account for delivery uncertainty, infrastructure constraints and potential delays to larger strategic sites.

For example, other authorities have incorporated flexibility allowances in excess of the standard 10% to ensure the robustness of their housing supply and to provide a greater degree of adaptability should circumstances change during the Plan period.

In this context, it is considered that the Vale of Glamorgan RLDP should incorporate a flexibility allowance of at least 15%. This would provide additional resilience within the housing trajectory and reduce reliance on a limited number of larger strategic allocations.
Smaller sites such as Candidate Site 409 at Waterton Lodge, Colwinston are particularly valuable in this context. Smaller sites are typically:
• More deliverable in the short term
• Less dependent on major infrastructure investment
• Capable of contributing to early housing delivery
• Able to increase overall build-out rates
Such sites can therefore play an important role in supporting the delivery of the Plan's housing requirement and enhancing flexibility within the supply.

HG1: Housing Allocations
Mr Raymond does not comment on any of the proposed housing allocations, however, does highlight that the delivery is incumbent upon a number of larger strategic sites, and that to allow a greater range and choice then smaller allocations in the Minor Rural Settlements are required. Only 122 units are proposed on smaller allocated sites, equating to approximately 2.6% of newly allocated supply under (E) Rural Affordable Housing Led Sites – policy HG4.

In the context of the above, there remains significant concern that the spatial strategy continues to exclude the required number of allocations within Minor Rural Settlements, including Colwinston.

The Plan recognises that Minor Rural Settlements provide an important range of services and facilities and play a functional role in meeting the needs of residents within rural areas. It further acknowledges that it is essential for the LDP to balance growth in a way that supports rural communities. Whilst general market housing is described as being limited to infill opportunities, the Plan also recognises that enabling an element of open market housing provides opportunities for the delivery of affordable housing and helps sustain rural communities.
It is agreed that the inclusion of smaller allocations can:
• Improve overall housing delivery rates
• Provide greater choice within the housing market
• Reduce delivery risk by diversifying supply
• Support rural communities through proportionate growth

Whilst it is noted that there is a proposed allocation within Colwinston – HG4 (1) – Land to the East of Colwinston for 25 units, Mr Raymond maintains that there is still a clear disconnect between the identified role and function of settlements such as Colwinston and the absence of any further allocated sites capable of delivering an appropriate range and choice of dwellings.

The strategy effectively restricts development to windfall and infill, without positively identifying opportunities that would logically consolidate and strengthen the settlement.
This approach is inconsistent with the settlement's accessibility and functional role. Colwinston is:
• Well connected to the A48 strategic highway network;
• Served by bus routes within close proximity to the site;
• Within commuting distance of Bridgend, Cowbridge, Barry and Cardiff;
• A sustainable and established residential community.
Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409) represents a contained and sustainable opportunity that naturally rounds off the existing settlement boundary. The site encloses the envelope of development without encroaching into open countryside or extending beyond the established line of built form. It is well related to existing services and infrastructure and is capable of accommodating a modest allocation consistent with the scale and

character of the village.

A proportionate allocation at this location would align with the stated objectives of supporting rural communities, enabling a mix of market and affordable housing, and providing genuine choice within Minor Rural Settlements. The continued absence of such allocations undermines the internal consistency of the spatial strategy.

Furthermore, the strategy places substantial emphasis on rail-based corridors. Whilst development near rail infrastructure is supported in principle, sustainable growth should not be exclusively rail-led. Strategic highway connectivity and bus accessibility also represent legitimate and sustainable locational advantages.

The complete absence of allocations in Minor Rural Settlements creates an imbalance in distribution and limits housing choice. A modest allocation at Waterton Lodge would represent proportionate growth consistent with the scale and character of the settlement.

HG4 – Affordable Housing Allocations
It is recognised that Policy HG4 does allocate development within some Minor Rural Settlements, and in particular within Colwinston HG4 (1) – Land to the East of Colwinston for 25 units. In the context of Policy HG4 they will be affordable housing led sites where there will be a requirement for the provision of a minimum 50% affordable housing. This is to meet the affordable housing needs of the local community. Mr Raymond has no objection in principle to this but does object to the fact that there is no other development opportunities recognised in Colwinston (despite it being sustainably located on the A48).

Furthermore, Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409) could be reduced in size and could be amended to offer 50% affordable housing to accord with the policy (or even 100% affordable if the Authority sought this).

A balanced approach which allows both affordable housing led schemes and modest mixed-tenure developments would provide greater flexibility and assist in delivering a broader range of housing needs.

A modest development at Land adjacent to Waterton Lodge, Colwinston (Candidate Site 409) could provide an opportunity to deliver both market and affordable housing in accordance with Policy SP8. This would support local housing needs whilst maintaining the scale and character of the settlement.

Candidate Site Response: Land adjacent to Waterton Lodge, Colwinston (Candidate Site 409)
Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) was submitted to the Vale of Glamorgan Council during the 2022 Call for Candidate Sites as part of the preparation of the Replacement Local Development Plan (RLDP) 2021–2036.

The site is currently included within the Candidate Site Register, which represents a list of sites submitted for consideration through the plan-making process. Inclusion within the register does not in itself indicate that a site will be allocated for development, as all sites are subject to a structured assessment process.

These stages consider a range of factors including sustainability, accessibility, environmental constraints and deliverability.

As part of the ongoing plan preparation process, the Council produced an updated Candidate Site Register following the initial submissions. Sites continue to be evaluated as part of the evidence base supporting the RLDP.

In this context, Land adjacent to Waterton Lodge, Colwinston represents a sustainable and deliverable opportunity for modest residential development which could contribute positively towards the Plan's housing supply.

The site is located adjacent to the existing settlement and is well related to the current built form. Development in this location would represent a logical and contained extension to the village, rather than an isolated incursion into open countryside.

Furthermore, the site has been promoted through the formal candidate site process and should therefore be considered fully within the Council's site assessment framework.

Deposit Plan Considerations
Settlement Boundary

Given the location of Candidate Site 409 adjacent to the existing settlement of Colwinston, consideration should be given to whether a modest adjustment to the settlement boundary would enable the site to be appropriately integrated within the settlement.

A logical rounding-off of the existing settlement edge would allow development to occur in a manner that respects the existing built form and maintains a clear and defensible settlement boundary.

Such an approach would represent a proportionate response to the need for modest housing growth within rural

settlements.

Site Assessment
The site was formally submitted through the Candidate Site process and is currently listed within the Council's Candidate Site Register.

Given the role that smaller deliverable sites can play in supporting housing delivery, it is important that sites such as Land adjacent to Waterton Lodge, Colwinston are fully considered as part of the ongoing assessment process. Smaller sites can provide valuable flexibility within the housing trajectory and contribute to early housing delivery within the Plan period.

Turning to the main reasons the site was not taken forward Mr Raymond provides the following response:
(a) Alleged intrusion into the open countryside
The Stage 2 Register cites "unacceptable intrusion into the open countryside". Mr Raymond submits that this conclusion fails to reflect the site's physical containment and relationship to the built form.
• The site directly adjoins existing dwellings at Waterton Lodge and mature boundary hedgerows; development here would constitute rounding-off rather than isolated sprawl.
• A strong landscape framework already exists, and additional planting could reinforce defensible boundaries.
Accordingly, the site's development would not materially extend the settlement into open countryside or harm landscape character, consistent with PPW paragraph 3.60.
(b) Highways and accessibility constraints
The Council refers to "major highways constraints" but no evidence highway assessment has been published by the Authority. Mr Raymond's preliminary review confirms that safe vehicular access can be achieved from the adjoining local highway with modest engineering works and that the scale envisaged would generate limited traffic, well within local-road capacity.
Future submission of a Transport Statement can demonstrate compliance with PPW (Section 5: Active and Socially Just Places) and LDP Policy MD2 (criteria 6 and 8).
The site lies within walking distance of Colwinston's core facilities (village hall, public house, bus stops), enabling sustainable travel choices for residents.
(c) Scale of development
Development at a scale that represents proportionate growth for Colwinston can be provided and would be entirely consistent with the "limited expansion" envisaged for minor rural settlements under PPW and the RLDP.
This level of growth would strengthen local demographics, support the rural housing supply and modestly contribute to the Vale's overall housing requirement, without exceeding infrastructure capacity.
(d) Ecology, landscape and agricultural land classification
The land is semi-improved grassland with no statutory designations. Preliminary review indicates no SINC coverage or protected species constraints. Detailed ecological and agricultural-land surveys can be provided to confirm that any residual impacts are minor and capable of full mitigation.

Development can achieve net biodiversity gain through buffer planting, sustainable drainage and native-hedgerow reinforcement, fully consistent with PPW and RLDP environmental objectives.

5. Sustainability and deliverability
• Availability: Mr Raymond, as landowner/promoter, confirms the site is immediately available for development.
• Deliverability: The site is modest, unconstrained by flood risk or abnormal infrastructure requirements, and can deliver homes within the early part of the plan period.
The proposal supports rural-settlement vitality, contributes to local housing choice, and allows design to embody placemaking principles (PPW Ed. 12 Section 2).

Conclusion
This representation, submitted on behalf of Mr Raymond in response to the current Vale of Glamorgan Council Replacement Local Development Plan (RLDP) 2021–2036 Deposit Plan Consultation, maintains that Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409) represents a logical, sustainable and deliverable parcel that should be allocated as a suitable and viable residential site within the RLDP.

Accordingly, the site is considered to represent a suitable, available and achievable allocation capable of contributing to the housing requirement, supporting affordable housing delivery, and reinforcing the spatial objectives of the Plan.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3vf

6894 Comment

Document Element: SP2 – SETTLEMENT HIERARCHY

Respondent: Catesby Estates [3713]
Agent: Turley

Summary:

Policy SP2 – Settlement Hierarchy broadly distributes development in line with the hierarchy of settlements, reflecting the role and function of places and directing growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision. Llandow is identified as a Minor Rural Settlement, new development associated with which should be mainly limited to infill opportunities and small-scale affordable housing led schemes (sites of up to 25 dwellings with a minimum of 50% affordable provision).

Catesby would suggest that specific sites in and around all settlement types may be suitable for a greater level of development than that suggested by the settlement hierarchy, and these should be explored accordingly. As part of this, Catesby SUPPORTS the recognition in the Policy Framework that the existing services and facilities in and around the Minor Rural Settlements should be safeguarded, supported and enhanced, and that in order to do this, growth should still be balanced in a way which supports these rural communities (Paras 6.16 and 6.17).

Full text:

VALE OF GLAMORGAN DEPOSIT REPLACEMENT LOCAL DEVELOPMENT PLAN - REPRESENTATION ON BEHALF OF CATESBY ESTATES

This response to the consultation on the Vale of Glamorgan Council ('VoGC') Deposit Replacement Local Development Plan ('RLDP') is submitted by Turley on behalf of Catesby Estates ('Catesby'). It sets out Catesby's comments on the Vale of Glamorgan Deposit Replacement LDP published for consultation on 28th January 2026.

Catesby control a significant amount of land at, and surrounding Llandow Airfield, and sought promotion (previously promoted by L&Q Estates prior to its acquisition by Catesby) of the site during the call for Candidate Sites (Site ID Ref: 448). The Stage 2 Candidate Site Register confirms that the site was not considered suitable for further consideration by VoGC. This was primarily due to its location outside of existing settlement boundaries and the scale of dwellings/services proposed. It was concluded that the scale of development proposed could be considered a new settlement, which should only be proposed as part of a joint LDP, an SDP or Future Wales.

Catesby acknowledges that promotion of a site of this scale falls outside the scope of the RDLP. The site will be promoted through the emerging South East Wales Strategic Development Plan in due course. Catesby maintains that the site is capable of accommodating major development and that its promotion for strategic scale regeneration is entirely appropriate given its sustainable credentials and the contribution that it can make to the Vale of Glamorgan and wider Cardiff Capital Region. Catesby remains keen to working collaboratively with VoGC to bring forward development at Llandow in the medium to long term and looks forward to continuing the largely positive discussions that have taken place to date.

VISION AND STRATEGIC OBJECTIVES

The vision for the Deposit RLDP maintains that, by 2036, VoGC will provide housing growth which responds to the authority's growing population and caters for all. This should be shaped through successful placemaking, delivering diverse communities and ensuring that the Vale is a healthy and inclusive place for everyone.

VoGC identifies key themes and strategic objectives to deliver the vision of the Deposit RLDP. This includes "ensuring that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population", to address the accommodation needs of all the Vale's communities (Objective 3 - Homes for All). Objective 4 – Placemaking also seeks for new development to be appropriately located, contribute towards creating active, safe and accessible places, and protect and enhance the character of existing communities.

The provision of a mix of new homes is also crucial in fostering diverse, vibrant and connected communities in line with Objective 7. Consequently, physical, economic and social regeneration are facilitated, reflecting the needs and aspirations of local communities. Vital and vibrant rural communities are also provided through the delivery of growth in sustainable locations and supporting infrastructure.

Catesby broadly SUPPORTS the vision and strategic objectives of the Deposit RLDP to deliver a mix of high-quality new housing which responds to the authority's growing population, caters for all, and has placemaking at its heart. This new housing should be facilitated across the Vale in a variety of sustainable locations to best serve as many communities as possible.

SUSTAINABLE GROWTH STRATEGY

A key part of the Sustainable Growth Strategy for the Deposit RLDP is to deliver a sustainable level of housing growth which accords with the Vale's position within the Cardiff Capital Region (CCR). Specifically, the Deposit RLDP makes provision for a housing requirement of 7,980 dwellings over the Plan period (526 dwellings per annum). The Deposit RLDP makes clear that this is both deliverable and ambitious, reflecting the Vale's position in the Future Wales national growth area. Crucially, the housing requirement will be achieved through a range of housing opportunities, to encourage

existing residents to live and work in the Vale and encourage inward migration of new residents, at a level commensurate with the CCR.

However, Catesby would suggest that this level of growth is still too low, taking into account the aspirations of Future Wales for the area and the latest population and household projections, which suggest a higher level of need is required for the Vale.
The Sustainable Growth Strategy also seeks for new and existing housing, employment, services and facilities to be co-located to reduce the need to travel. New housing development shall be specifically located in places that are already well served by existing and/or proposed services, facilities and employment opportunities. This includes, where appropriate, those offered by the business parks and industrial estates already established in the Vale. The Strategy also allows for regeneration opportunities on previously developed and under-utilised land.

The Key Diagram (Figure 1) identifies the proposed Strategic Growth Area (SGA), connectivity routes, key locations for future development, the Plan's hierarchy of settlements and interrelationships with adjoining local authorities.

Figure 1: Key Diagram

Catesby considers that the Minor Rural Settlements dispersed within the 'Connectivity' corridor, such as Llandow, should play a supporting role in accommodating housing growth, given their important range of services and facilities that reduce the need to travel. The Sustainable Growth Strategy also allows for small scale affordable housing led developments in Minor Rural Settlements, where appropriate.

Noting Llandow's accessible location and proximity to existing and emerging strategic employment opportunities, Catesby broadly SUPPORTS the Sustainable Growth Strategy insofar as seeking to achieve the housing requirement through a range of housing opportunities. This includes the co-locating of housing and employment growth, with a focus on established business parks and industrial estates.

Paragraph 5.14 notes that "where appropriate, the broad principle is that the spatial strategy should look to ensure that new housing is in places where employment opportunities already exist or are proposed." Catesby supports this principle, noting that the Llandow Airfield site offers the potential to deliver co-located residential and employment opportunities at scale, as identified within the promotion document submitted in support of its response to the call for Candidate Sites. This will remain a key aspiration of the site's future promotion via the emerging SDP.

However, Catesby reiterates that the housing requirement for the Vale should be higher, accounting for the aspirations of Future Wales for the area and the latest population and household projections. A more ambitious Growth Strategy is needed to accommodate this increased housing requirement.

POLICY FRAMEWORK

Policy SP1 - Sustainable Growth Strategy reiterates that the Plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that, outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.

In order to ensure that the minimum target figure is met, it is important that the Plan identifies a sufficient number of sites / housing allocations to meet both the short and longer term development needs. As previously stated, Catesby SUPPORTS the overall growth strategy across the Vale of Glamorgan contained in the Deposit RLDP. However, it is questioned whether or not there is sufficient land allocated to deliver the growth required.

Of the overall housing target of 7,890 dwellings, approximately half of these are to be delivered via rolled forward allocations and extant consents. Whilst some such sites can be expected to come forward, Catesby would caution against the over-reliance on delivery of historically allocated sites.

Catesby suggests that VoGC considers the inclusion of additional sites to deliver the predicted growth strategy identified in the RLDP. This will strengthen the land supply position ensuring a robust RLDP can be adopted which has the ability to ensure the delivery of the necessary growth. Catesby supports growth along the 'Connectivity' corridor, particularly in Minor Rural Settlements such as Llandow to assist with this.

Policy SP2 – Settlement Hierarchy broadly distributes development in line with the hierarchy of settlements, reflecting the role and function of places and directing growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision. Llandow is identified as a Minor Rural Settlement, new development associated with which should be mainly limited to infill opportunities and small-scale affordable housing led schemes (sites of up to 25 dwellings with a minimum of 50% affordable provision).

Catesby would suggest that specific sites in and around all settlement types may be suitable for a greater level of development than that suggested by the settlement hierarchy, and these should be explored accordingly. As part of this, Catesby SUPPORTS the recognition in the Policy Framework that the existing services and facilities in and around the Minor Rural Settlements should be safeguarded, supported and enhanced, and that in order to do this, growth should still

be balanced in a way which supports these rural communities (Paras 6.16 and 6.17).

Policy SP3 – Development in the Countryside is clear that development will only be permitted in the countryside where it falls within one of the specified uses. This only includes Affordable Housing Exception Sites in respect of housing development. Catesby suggests that further development sites are required across the Vale in order to meet the Council's housing requirement, which should consider locations within the countryside where appropriate.

Catesby reiterates that the co-location of housing with existing infrastructure and facilities will be crucial to achieving the overall Growth Strategy of the RLDP. Development in and adjacent to Minor Rural Settlements is also key to this, especially those located in proximity to the 'Connectivity' corridor on the Key Diagram.

Catesby SUPPORTS development within these locations, particularly at Llandow. This is key in order for the Vale of Glamorgan to achieve part of its overarching vision, which states that "growth within rural settlements has provided for the needs of residents and supports balanced multi-generational communities that contribute to the vibrancy of the rural area".

SUMMARY

We trust that the above representations can be considered duly made and look forward to receiving confirmation accordingly. Catesby welcomes the opportunity to comment further as the RLDP progresses through to adoption. Catesby looks forward to engaging with the Council over the months ahead to continue a dialogue regarding the future delivery of development at Llandow. If you require any further information, please do not hesitate to contact me on the details below.

Change suggested by respondent:

Catesby would suggest that specific sites in and around all settlement types may be suitable for a greater level of development than that suggested by the settlement hierarchy, and these should be explored accordingly.

Sound: Not specified

Attachments:

Redacted Representation Form - https://valeofglamorgan.oc2.uk/a/3cc
Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/4sn

6898 Object

Document Element: SP2 – SETTLEMENT HIERARCHY
Respondent: Barratt Redrow Homes [2669]
Agent: Boyer Planning

Summary:

In principle, Barratt Redrow supports the Settlement Pattern set out in the Deposit Plan, particularly the identification of Wenvoe as a Primary Settlement.

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

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

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

With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge''. Barratt Redrow do not consider this to be sufficient justification.

Full text:

1. INTRODUCTION
1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.
1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:
• Section 3 – The Vale of Glamorgan Key Characteristics;

• Section 4 – RLDP Key Themes, Vision, and Objectives;
• Section 5 – Sustainable Growth Strategy; and
• Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.
1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS
Settlement Pattern
2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.
2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Need
2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
3. RLDP KEY THEMES, VISION, AND OBJECTIVES
3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.
Key Themes
3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement

is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY
Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage

contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that

to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

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

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

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

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

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

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

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

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

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

Policy SP2 – Settlement Hierarchy

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

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

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

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

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

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

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

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

Policy SP4 - Placemaking

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

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

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

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

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

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

Policy PGD1 – Creating Well Designed and Inclusive Places

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

Policy PGD2 – Residential Development Densities

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

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

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

5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should

be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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Unsustainable Location & Poor Connectivity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and

would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.

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

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

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

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

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

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

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

• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.

• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.

• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.

• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.

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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
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• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply
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• HG1 (8) St Athan - Clive Road, St Athan

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

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

Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at

the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).

• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).

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

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

• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.

• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.

• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:

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

i. Space heating demand less than or equal to 40kWh/m2/year;

ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.

• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes

access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
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Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge

of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established 'defensible' limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be 'largely shielded from view by woodland blocks/strips'.
• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for 'infilling' the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.
• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
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Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.
• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
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MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
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• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
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Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
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CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the Council's vision for the VoG.
• 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to

account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
• 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
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6. CONCLUSION
• Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.
• Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swn Y Coed, are necessary to ensure the RLDP is able to effectively meet
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

7015 Object

Document Element: SP2 – SETTLEMENT HIERARCHY
Respondent: Lidl GB Limited [1459]
Agent: CarneySweeney

Summary:

The settlement boundary, defined by Policy SP2, excludes allocation site SP12 'Land at Bridge House Farm, Llanmaes, Llantwit Major' which is for a retail foodstore. Instead, the draft allocation abuts, but lies outside, the settlement boundary as currently drawn. Although draft Policy SP3 states that "Areas outside settlement boundaries that are not allocated or protected for a specific use will be defined as countryside we consider the settlement boundary must be extended at this location to include the allocation. Its exclusion is illogical and would fail to reflect the 'on the ground' position when this allocation is delivered. Moreover, its exclusion could confuse and may constrain any future minor development changes at the site (e.g. those needed to meet operational needs the subject of any planning application). The draft proposals map shows the allocation as a dot which does not cover the full extent of the allocation. See below: see plan in attachment

By not including the extent of the site/allocation within the defined settlement boundary, the draft plan fails to recognise the allocation will form an important part of the settlement, the delivery of which is crucial to meeting identified needs. Accordingly, we believe this fails Test 2 (Is the plan appropriate?), and it may fail Test 3 (

Full text:

Draft RCS2 sets out three criteria for new A1, A2 or A3 uses on new sites or existing retail areas which are as follows:
1. "It can be demonstrated that there is an additional need for the proposal which cannot be provided within an existing retail, commercial and service centre; and
2. The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.
3. The proposal would serve local needs in a neighbourhood or rural village."
We consider the policy should read as follows:
"1 It can be demonstrated that there is an additional need for the proposal which, when applying the sequential approach to locating development as outlined in national guidance, it has been demonstrated that the site is sequentially preferable; and
2 The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.
3 Proposals serving only local needs should be of a scale and type which does not undermine the vibrancy, attractiveness and viability of neighbourhood centres."

The settlement boundary, defined by Policy SP2, excludes allocation site SP12 'Land at Bridge House Farm, Llanmaes, Llantwit Major' which is for a retail foodstore. Instead, the draft allocation abuts, but lies outside, the settlement boundary as currently drawn. Although draft Policy SP3 states that "Areas outside settlement boundaries that are not allocated or protected for a specific use will be defined as countryside we consider the settlement boundary must be extended at this location to include the allocation. Its exclusion is illogical and would fail to reflect the 'on the ground' position when this allocation is delivered. Moreover, its exclusion could confuse and may constrain any future minor development changes at the site (e.g. those needed to meet operational needs the subject of any planning application). The draft proposals map shows the allocation as a dot which does not cover the full extent of the allocation. See below: See plan in attachment

By not including the extent of the site/allocation within the defined settlement boundary, the draft plan fails to recognise the allocation will form an important part of the settlement, the delivery of which is crucial to meeting identified needs. Accordingly, we believe this fails Test 2 (Is the plan appropriate?), and it may fail Test 3 (Will the plan deliver) as its exclusion from the boundary may unduly impact the future site operation.

Lidl Great Britain Ltd objects to draft policy SP11 (Retail, commercial and service centre hierarchy) as worded as it fails to meet Test 2 (Is the plan appropriate?). Draft Policy SP11 sets out the proposed retail hierarchy (See extract below), but it does not accord with the settlement hierarchy as set out in draft Policy SP2 and it is not justified.
The adopted LDP Settlement Hierarchy lists:
Key Settlement: Barry
Service Centre Settlements: Cowbridge, Llantwit Major and Penarth
The adopted LDP Retail hierarchy lists:
Town centres: Barry
District centres: Barry (high street/broad street), Cowbridge, Llantwit Major, Penarth
Draft SP2 of the Deposit Plan identifies Cowbridge, Llantwit Major and Penarth as Service Centre Settlements in the Settlement Hierarchy.
However, draft SP11 lists a retail hierarchy as follows:
Town Centres – Barry (Holton Rd), Penarth, Cowbridge
District Centres – Barry (High Street), Llantwit Major
It is unexplained and unjustified that the SP11 retail hierarchy upgrades Cowbridge to Town Centre status, while Llantwit Major and Barry High Street remain District Centres.
The Deposit Plan includes two retail allocations, neither are intended to directly serve Penarth or Cowbridge. Cowbridge is not a focus for growth. It is therefore unjustified that Llantwit Major, which is served by a train station, is a settlement roughly twice the size of Cowbridge (by population) and is a manifestly more sustainable location and more appropriate focus for growth, is proposed to rank below Cowbridge in the retail hierarchy. Barry, Penarth and Llantwit Major should rank as Town Centres as the most sustainable locations for growth.
Penarth is an accessible settlement and an appropriate focus for growth. Indeed, the Council's BP13 (Retail and Commercial Leisure Study (June 2023)) recommends a medium to large supermarket to serve Penarth (Zone 5) but the Deposit Plan is absent of any food retail allocation for Penarth/Llandough. In addition to Llantwit Major and St Athan (Deposit Policy SP12) Penarth should be a focus for additional convenience provision over the plan period.

SP12 – RETAIL FLOORSPACE PROVISION

Lidl Great Britain Ltd firmly supports the allocation within draft Policy SP12 (Retail Floorspace Provision) for 1,251sqm of convenience floorspace at Land at Bridge House Farm, Llanmaes, Llantwit Major. This allocation is needed to ensure the plan is sound, by addressing unmet need at Llantwit Major which is a Service Centre and focus for growth. This should be made clear in the reasoned justification.

In respect to Penarth, Policy SP12, together with supporting paragraphs 6.208–6.210, do not, however, adequately reflect the findings of the Council's Retail & Leisure Study (BP13). Policy SP12 should also plan positively for the identified convenience retail needs within Zone 5 (Penarth/ Llandough). BP13 confirms that Penarth District Centre is not served by a medium to larger supermarket (para. 9.2). The BP13 Study finds quantitative and qualitative capacity for a medium to larger supermarket by 2036 in Penarth (paras. 9.23, 12.24).

It finds overall quantitative convenience capacity of up to c.5,862sqm net floorspace (assuming deep discounter operators). In qualitative terms the following Centres have been identified in potential need for a medium to larger supermarket: Barry Holton Road town centre; Penarth district centre and Llantwit Major district centre. Quantitative and qualitative need is identified.

Despite the evidence of unmet need, the Deposit LDP Policy SP12 allocates only two sites for convenience retail totalling c. 3,109sqm net; one site at Llanwit Major and a second site at St Athan. This is below the overall (up to 4,282–5,862sqm net) requirement identified in BP13. The allocation of land at Llantwit Major aligns with the evidence base, has been thoroughly tested at application stage and this is fully supported.

Policy SP12 is silent on the need for additional floorspace at Penarth/Llandough (Zone 5) and as such does not reflect the evidence base findings and address identified need in Penarth, with a 'residual' quantitative capacity of c.1,173–2,753sqm net unmet/unallocated. We note Policy SP12 states that any additional convenience and comparison retail floorspace beyond that provided by the identified sites should be directed towards the town and district centres outlined in Policy SP11. However, this merely reflects national guidance in respect to directing growth to town/district centres (i.e. applying a sequential approach). The Policy should go further and seek to allocate the residual unmet need to Penarth/ Llandough. We note the BP13 is silent on additional need at St Athan.

Planning Policy Wales (PPW) 12 requires LPAs to identify the appropriate form, scale and location to meet retail needs (para. 4.3.8) and emphasises ensuring communities have access to adequate retail provision (para. 4.3.13). PPW therefore places a duty on LPAs to plan positively for evidenced retail needs. In respect to Penarth/Llandough Policy SP12 should seek to address this requirement.

Under PPW and TAN4, LPAs must apply the sequential test, directing new retail development to locations that are:

• In-centre,
• Edge-of-centre, and only then,
• Out-of-centre locations that are accessible and well-connected to the catchment.

Penarth Centre is physically constrained. In the absence of any in-centre or edge-of-centre sites capable of accommodating a medium/larger supermarket, the next sequentially preferable option is the most accessible, well-connected site within the same catchment, capable of meeting identified need and reducing expenditure leakage.

Policy SP12 should plan positively for needs in Zone 5 (Penarth/Llandough) and include provision for a medium to large convenience foodstore in Zone 5 in accordance with BP13.

Enclosed with this representation is a separate representation (Under 8. New site submission) promoting a site for food retail development to meet identified needs within the Zone 5 Penarth/Llandough catchment. The site is considered accessible and sequentially preferable to meeting identified needs in Penarth.

The policy should be clear that identified need should be delivered in accordance with the sequential approach as set out in national guidance. As set out in Policy SP12 any additional convenience and comparison retail floorspace beyond that provided by identified sites should be directed towards the town and district centres in accordance with the sequential approach. We support that the inclusion of retail floorspace as part of a mix of uses on allocated sites will also be supported.

POLICY DNP2 – GREEN WEDGES

Lidl objects to the inclusion of land at Penlan Road, Llandough (see Site Location Plan, drawing no. 3744 F420) within the Green Wedge designation under Policy DNP2. The site forms a distinct and enclosed parcel of land on the north-eastern edge of the designated Green Wedge, and its physical characteristics demonstrate that it does not serve the strategic purposes of the wider designation.

The northern and western boundaries are formed by Llandough Hospital, including the hospital access road and surface car parking, which clearly separate the site from the wider Green Wedge. The southern boundary is defined by residential properties along Corbett Road and the Merrier Harrier public house. The south-western and western boundaries are formed by further residential properties within Llandough. As such, built development extends beyond the site in multiple directions, meaning it does not contribute to the open land between settlements that Green Wedges are intended to protect.

The site is physically and visually contained with strong, defensible boundaries. Its close association with existing built form means that it does not exhibit the level of openness required for Green Wedge designation under PPW or BP27. BP27 requires Green Wedge boundaries to include only land that must remain open in the long term. When assessed against the four-stage SE Wales Green Wedge methodology, the site performs weakly. In terms of openness (Stage A), the site has low perceived openness as it is enclosed by development. Under development pressure (Stage B), the influence of surrounding built form means the site is already urban in character. In relation to Green Wedge purposes (Stage C), the site does not materially contribute to preventing coalescence, safeguarding open countryside, or protecting the setting of an urban area. The conclusion (Stage D) is therefore that the site's inclusion within the Green Wedge is anomalous.

Recent decisions in the emerging RLDP, such as the allocation of HG1 KS2, demonstrate that selective Green Wedge boundary amendments are acceptable where supported by evidence. Not all areas within the current designation are equally sensitive, and the site represents one of the least sensitive parts.
The Council's own evidence further supports the suitability of the land for development. The site does not lie within the Special Landscape Area that covers much of the remaining Green Wedge, highlighting its lower landscape sensitivity. The Candidate Site Assessment (BP18a examined the wider parcel (Site ID 400) for housing and concluded that it would form a natural extension to the Llandough settlement boundary. It noted that the land would represent an incursion only if less sensitive sites could not be delivered and discounted the site solely because housing need had been met elsewhere, not due to landscape or Green Wedge harm. This confirms the Council recognises the land is capable of development. The same land can therefore appropriately meet other evidenced needs, including retail provision.
In separate representations, Lidl is promoting land to the south of Llandough Hospital via 'RDLP New site submissions'. It is considered that the site can be developed in a low-impact, landscape-led and sensitively designed manner that respects its transitional position between the urban edge and the wider Green Wedge. A modest single storey medium sized foodstore delivers a built form that can sit comfortably below surrounding tree lines and hospital structures. A comprehensive landscape strategy, including reinforced boundary planting, native woodland edge enhancement, and carefully designed building can soften building edges, strengthen the site's defensible boundaries, and integrate the scheme with its surroundings. The development would therefore appear as an infill of the existing urban area, rather than any intrusion into the open countryside, and can be designed to maintain the wider Green Wedge's openness and character by delivering a strong defensible physical boundary which prevents any further development beyond the site.
As set out in separate representations the Council's Retail and Leisure Study (BP13) identifies a clear quantitative and qualitative need for a medium to larger supermarket within Zone 5, alongside notable levels of convenience expenditure leakage to Zone 3 (Cardiff). The promoted site is well positioned to intercept this leakage, meet the identified convenience floorspace requirement, and provide improved local convenience retail provision for Llandough/Penarth. There is, therefore, a clear needs-based justification for release of this parcel of land from the Green Wedge designation.
The Green Wedge boundary should be amended at this location to remove the promoted site from Policy DNP2 (Green Wedge designation) and from the Proposals Map. In parallel, the settlement boundary defined by Policy SP2 should be realigned to include the promoted site, reflecting the site's physical relationship with existing development, its defensible boundaries, and its suitability to meet an evidenced strategic retail need.

The Policy text should be changed as follows:
"Proposals involving the change of use at ground floor level uses from A1 retail use within Service Centres will permitted where the proposal would:…"
The Policy RCS1 (Resilient retail, commercial and service centres) supporting text adds new policy requirements which are not within the draft policy. Paragraph 6.214 states that:
"Changes of use class in Retail, Commercial and Service Centres must be justified by evidence that the property has been affected by a sustained period of long-term vacancy and that proactive marketing has been undertaken by a property agent for a minimum of 12 months in an effort to secure tenants. The marketing report should include:
• Details of the existing use or previous use if vacant;
• The length of time the unit has been vacant, if applicable;
• The type of use which the unit has been marketed for, what the marketing strategy involved and its duration;
• The amount of interest in the unit during the marketing period – this should detail the number of queries, the type of uses sought, and if known, the reason for not pursuing any initial enquiries."
However, nowhere in the draft policy wording does it explicitly state to include 12 months of marketing activity. The draft supporting text reads as though this is a policy requirement, rather than supportive guidance. This is contrary to caselaw which confirms that supporting text cannot be used to expand the policy beyond its wording (R (Cherkley Campaign Ltd) v Mole Valley District Council). A proposal could meet the requirements of the criteria sets out in draft policy RCS1 without being marketed for a minimum of 12 months. If the Plan is adopted as currently set out, there is a risk of internal inconsistency between policy RSC1 and the supporting text. Accordingly, this would fail Test 2 (Is the plan appropriate?) as it is not coherent or consistent.
We also have concerns with criterion 5 which states to "Avoid an over-concentration of non-retail uses that would undermine the retail function of the centre". This is because 'over-concentration' has not been defined within the draft policy. This contrasts with draft policy RCS3 which includes a definition of what an over-concentration of hot food takeaways would be. Without a definition of what an over-concentration of non-retail uses is, the draft policy will remain and lack clarity. Additionally, without a definition, the draft policy may fail Tests 2 and 3 as it is currently unclear (Test 2: Is the plan appropriate?) and cannot be effective (Test 3: Will the plan deliver?).

At present, we consider the Deposit Plan inadequately supports the Welsh language. Although the Welsh Language is included within Objective 6 (Embracing Culture and Heritage), the Deposit Plan does not contain a policy which seeks to promote the Welsh language, nor is the promotion of the Welsh language referenced in other Deposit Plan policies where this may be appropriate. Without a clear policy, applicants do not need to explicitly consider impact on the Welsh language so the role of the RLDP will be limited.
Local Development Plans should accord with national policy and guidance. For instance, the supporting text to Policy 1 of Future Wales states that "Key issues, including … the Welsh language, are core elements of policy 1 and are common threads underpinning all Future Wales policies." However, we believe that the Welsh language is not currently underpinning the policies within the Deposit Plan.

Additionally, paragraph 3.25 of PPW states that “The Welsh language is part of the social and cultural fabric and its future well being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. The land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its, use and the Thriving Welsh Language well being goal.” Paragraph 3.29 goes on to suggest language impact assessments are required for “large developments not allocated in a development plan which are proposed in areas of particular sensitivity or importance for the language” with these areas defined in the LDP. In this instance, PPW sets out guidance for developers which is not present in the Deposit Plan.
The Vale of Glamorgan Council commissioned AECOM to produce the Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan (November 2025). Paragraph 9.5.9 recommends including a specific policy that supports and protects the Welsh language within the Deposit Plan. This contrasts with the Welsh Language (November 2025) Background paper, produced by the VoGC, which concludes that a specific Welsh Language policy is not warranted, albeit it does acknowledge the Plan’s statutory duty to consider the Welsh language and embed relevant provisions within broader thematic policies. However, this is currently lacking as the Deposit Plan does not reference the Welsh language within other policies. Although the Background Paper considers that the RLDP is “unlikely to adversely affect the existing patterns of Welsh language use within the Vale of Glamorgan”, the Plan should seek to promote the Welsh language.
Developers should be encouraged to promote the Welsh language where this may be reasonable and appropriate e.g. bilingual signage and announcements. Lidl actively promotes the Welsh language through their business. The Deposit Plan should be amended to strengthen the importance of the Welsh language, helping to meet Objective 6 over the RLDP period. Overall, without clear Welsh Language policy promotion, the Deposit Plan cannot positively impact the Welsh language. The Deposit Plan needs to go further.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rm
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rn
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4ry
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rp
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rq
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4sr

7059 Object

Document Element: SP2 – SETTLEMENT HIERARCHY
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

Barratt Redrow objects to Policy SP2 in its current form.
The policy framework remains highly restrictive and the approach towards Minor Rural Settlements is considered to be too blunt and is not justified by evidence.
Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council’s consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council’s work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council’s own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council’s own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council’s

established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points

and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."
The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.
5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such

matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.
In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing

need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility

allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.

Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part

Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.

The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.

That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.

There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.

The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.

In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.

Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part

Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.

The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.

In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly

treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.

8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.

The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.

Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:

• the Plan is overly reliant on a small number of key sites;

• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;

• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and

• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.

The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.

Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.

The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:

• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.

• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.

• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.

All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.

In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.

Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part

Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.

However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.

Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities

and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.
Policy CI1 – Open Space Provision
Position: Support in principle / Object in part
Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.
The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible

acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.
There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.
Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings

may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.

The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.

Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.

Land at St Nicholas / omission from the Deposit Plan Position: Object to omission

Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.

The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.

Deposit Plan Conclusion

Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.

In particular:

• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;

• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;

• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;

• the Plan relies too heavily on key sites, rolled forward sites and windfalls;

• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and

• the omission of St Nicholas is not justified by the Council's own evidence base.

The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.

For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.

Candidate Site Register - Site ID 486

Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.

Stage 2 Candidate Site Assessment

The Council's Stage 2 Candidate Site Assessment states:

"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."

The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:

Impact upon Character and Setting of the St Nicholas Conservation Area

Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.

The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:

• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;

• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;

• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and

• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.

Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment
We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW.
In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located

close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

Amend SP2.

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7097 Support

Document Element: SP2 – SETTLEMENT HIERARCHY
Respondent: Barratt Redrow Homes [2669]
Agent: Turley

Summary:

The identification of St Athan as a 'Primary Settlement' is supported.

Full text:

Policy SP1 - Sustainable Growth Strategy
Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.
It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.
In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"
Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be concentrated is supported.

Policy SP2 - Settlement Hierarchy
The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable. As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits

from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Policy SP4 - Placemaking
We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.
The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses... ' or to be developed at 'high densities... and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.
Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Policy PGDl - Creating Well Designed and Inclusive Places
There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer

Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.

The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy Cll - Open Space Provision
The wording of Policy Cll, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy Cll should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy CII requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7187 Support

Document Element: SP2 – SETTLEMENT HIERARCHY

Respondent: H Jones, L Sungur and P John [3741]

Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported.
Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the range of facilities and services provided in these settlements. It is also supported that these settlements are able to provide affordable led residential development of up to 50 dwellings (delivering 25 affordable units).

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis. Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

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

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

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

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

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

SP1 – Sustainable Growth Strategy

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

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

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

The housing figures quoted in SP1 indicate 7,890 dwellings (including the 3,070 affordable dwellings) to 2036, however these figures overall are inadequate over the plan period when considered against the 2022 WG household projections. The 2022-based household projections provide an indication of the future number of households, and their composition,

based on population projections and assumptions about households from recent censuses. The vale of Glamorgan demonstrates an increase of almost 12% in the number of households between mid-2022 and mid-2032; note this is the highest percentage increase by Local authority in Wales and way above the average for Wales as a whole (that stands at around 7% increase). The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both open market, but particularly Affordable) development across the Vale.

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

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the RLDP the supporting text of Policy SP2 states:
'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

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

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

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

PGD2 – Residential Development Densities

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

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

SP6 – Housing Requirement

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

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

SP7 – Affordable Housing Provision

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

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

SP8 – Affordable Housing Requirements

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

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

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

HG4 – Rural affordable housing led sites

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

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

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

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

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

SP13 – Community infrastructure and planning obligations

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

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

CI1 – Open Space Provision

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

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

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

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

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

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

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

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

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

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

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

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

7188 Comment

Document Element: SP2 – SETTLEMENT HIERARCHY
Respondent: H Jones, L Sungur and P John [3741]
Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

The limit on small scale rural affordable housing led developments (RAHLD) to 25 for these settlements is questioned and further flexibility recommended on a case by case basis. The provision of an increased number of units in the Primary Non SGA settlements must not be at the expense of a wider number of smaller rural sites with the ability to sustain smaller communities across the Vale, especially given the shortfall in numbers as outlined above.

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis.

Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

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

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

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

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

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

SP1 – Sustainable Growth Strategy

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

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

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

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

open market, but particularly Affordable) development across the Vale.

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

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the RLDP the supporting text of Policy SP2 states:
'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

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

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

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

PGD2 – Residential Development Densities

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

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

SP6 – Housing Requirement

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

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

SP7 – Affordable Housing Provision

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

area.

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

SP8 – Affordable Housing Requirements

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

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

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

HG4 – Rural affordable housing led sites

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

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

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

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

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

SP13 – Community infrastructure and planning obligations

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

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

CI1 – Open Space Provision

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

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

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

achieved.

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

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

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

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

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

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

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

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

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

6194 Object

Document Element: SP3 – DEVELOPMENT IN THE COUNTRYSIDE

Respondent: Ms Lucie Taylor [2506]

Summary:

SF&G recognise the importance of green wedges and other countryside land, for food production and suggest safeguarding land accordingly, aligned with housing growth. Our communities face challenges like poor health, climate change, and inequality, with a fragile food system vulnerable to shocks. The Welsh Government Community Food Strategy (2025) aims to develop diverse local food networks that work with nature not against it. Supportive policies are needed for small-scale horticultural farms to enable essential infrastructure, moving away from strict scrutiny and towards recognising genuinely necessary structures for agriculture, ensuring resilient and sustainable local food businesses.

Full text:

SF&G recognise the importance of green wedges and other countryside land, for food production and suggest safeguarding land accordingly, aligned with housing growth. Our communities face challenges like poor health, climate change, and inequality, with a fragile food system vulnerable to shocks. The Welsh Government Community Food Strategy (2025) aims to develop diverse local food networks that work with nature not against it. Supportive policies are needed for small-scale horticultural farms to enable essential infrastructure, moving away from strict scrutiny and towards recognising genuinely necessary structures for agriculture, ensuring resilient and sustainable local food businesses.

Change suggested by respondent:

Include policies to safeguard land and encourage food production especially horticulture - recognising the need for encouragement for small scale food production farms which add to food security and enhance biodiversity.

Sound: No

Attachments: None

6202 Comment

Document Element: SP3 – DEVELOPMENT IN THE COUNTRYSIDE

Respondent: Ms Lucie Taylor [2506]

Summary:

SF&G note that TAN 6 is outdated, requiring local authorities to update their local development plans with more current rural related policies. Wales faces challenges in self-sufficiency for fruit and vegetables, and the outdated TAN 6 hampers sustainable rural community development. We suggest the Vale of Glamorgan Council adopt planning guidance on Rural Enterprise Dwellings for horticulture, as Powys Council has, to support rural enterprise development. We are happy to collaborate on policy wording and approaches based on existing evidence to encourage sustainable rural growth.

Full text:

Due to the outdated nature of TAN 6 it is incumbent on local authorities to include more up to date policy in their local development plans.
We know Wales is not producing enough fruit and vegetables to feed ourselves in the future when we are likely to need it. see here - https://www.wcpp.org.uk/wp-content/uploads/2023/07/How-could-Wales-feed-itself-in-2035.pdf. Social Farms & Gardens is very concerned that Technical Advice Note 6 – Planning for Sustainable Rural Communities is considerably out of date (July 2010) and no longer delivering sustainable rural communities. It therefore falls on local authorities delivering replacement local development plan, to consider the latest evidence, trends, previous decisions and other written approaches. The Practice Guidance on Rural Enterprise Dwellings, although only considered an exemplar approach, has the potential to be used too prescriptively and in a way that is out of line with the needs of our rural economy and communities, especially given the climate and nature emergencies that have been declared.
We ask the Vale of Glamorgan Council to consider adopting planning guidance on Rural Enterprise Dwellings for horticulture - like Powys Council have done. see here - https://en.powys.gov.uk/article/16407/Rural-Enterprise-Dwellings-for-Small-Scale-Horticulture. This guidance can be more or less copied from Powys version like Bannau Brynchieniog have done. Therefore it is important that the RLDP provides positive wording in policies to encourage development in association horticultural enterprises including rural enterprise dwellings. We have an abundance of of evidence to support this approach and would be keen to collaborate on any potential wording or approaches.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6328 Object

Document Element: SP3 – DEVELOPMENT IN THE COUNTRYSIDE

Respondent: Penllyn Community Council (Clerk) [243]

Summary:

Provide additional or amended Planning policies [either free standing or within SP3 or HG5] to allow for single unit/micro development, by companies or individuals, of appropriate, affordable housing units within all communities including 'Hamlets and Smaller Rural Settlements' [in the Countryside] where this is supported by the local community and meets the requirements of SSC1.

These new/amended policy statements [alongside the existing requirements of SSC1 and HG5] could then be applied across all existing settlements and communities
currently classified as undefined 'Hamlets and Smaller Rural Settlements' and hence 'Countryside' to allow for controlled appropriate development of affordable homes to
meet the aspirations of Para 5.24. and the local Community.

Full text:

Provide additional or amended Planning policies [either free standing or within SP3 or HG5] to allow for single unit/micro development, by companies or individuals, of
appropriate, affordable housing units within all communities including 'Hamlets and Smaller Rural Settlements' [in the Countryside] where this is supported by the local community and meets the requirements of SSC1.

These new/amended policy statements [alongside the existing requirements of SSC1 and HG5] could then be applied across all existing settlements and communities
currently classified as undefined 'Hamlets and Smaller Rural Settlements' and hence 'Countryside' to allow for controlled appropriate development of affordable homes to
meet the aspirations of Para 5.24. and the local Community.

Change suggested by respondent:

Provide additional or amended Planning policies [either free standing or within SP3 or HG5] to allow for single unit/micro development, by companies or individuals, of
appropriate, affordable housing units within all communities including 'Hamlets and Smaller Rural Settlements' [in the Countryside] where this is supported by the local community and meets the requirements of SSC1.

These new/amended policy statements [alongside the existing requirements of SSC1 and HG5] could then be applied across all existing settlements and communities
currently classified as undefined 'Hamlets and Smaller Rural Settlements' and hence 'Countryside' to allow for controlled appropriate development of affordable homes to
meet the aspirations of Para 5.24. and the local Community.

Sound: Not specified

Attachments:

Email representation - https://valeofglamorgan.oc2.uk/a/thb

6631 Comment

Document Element: SP3 – DEVELOPMENT IN THE COUNTRYSIDE

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

Where developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.
We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.

Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.
Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design

can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where "qualifying activities" take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states 'The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.'
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal

gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery. Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)
identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.
South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of

multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.

3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and

Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.

• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

6895 Comment

Document Element: SP3 – DEVELOPMENT IN THE COUNTRYSIDE
Respondent: Catesby Estates [3713]
Agent: Turley

Summary:

Policy SP3 – Development in the Countryside is clear that development will only be permitted in the countryside where it falls within one of the specified uses. This only includes Affordable Housing Exception Sites in respect of housing development. Catesby suggests that further development sites are required across the Vale in order to meet the Council's housing requirement, which should consider locations within the countryside where appropriate.

Catesby reiterates that the co-location of housing with existing infrastructure and facilities will be crucial to achieving the overall Growth Strategy of the RLDP. Development in and adjacent to Minor Rural Settlements is also key to this, especially those located in proximity to the 'Connectivity' corridor on the Key Diagram.

Catesby SUPPORTS development within these locations, particularly at Llandow. This is key in order for the Vale of Glamorgan to achieve part of its overarching vision, which states that "growth within rural settlements has provided for the needs of residents and supports balanced multi-generational communities that contribute to the vibrancy of the rural area".

Full text:

VALE OF GLAMORGAN DEPOSIT REPLACEMENT LOCAL DEVELOPMENT PLAN - REPRESENTATION ON BEHALF OF CATESBY ESTATES

This response to the consultation on the Vale of Glamorgan Council ('VoGC') Deposit Replacement Local Development Plan ('RLDP') is submitted by Turley on behalf of Catesby Estates ('Catesby'). It sets out Catesby's comments on the Vale of Glamorgan Deposit Replacement LDP published for consultation on 28th January 2026.

Catesby control a significant amount of land at, and surrounding Llandow Airfield, and sought promotion (previously promoted by L&Q Estates prior to its acquisition by Catesby) of the site during the call for Candidate Sites (Site ID Ref: 448). The Stage 2 Candidate Site Register confirms that the site was not considered suitable for further consideration by VoGC. This was primarily due to its location outside of existing settlement boundaries and the scale of dwellings/services proposed. It was concluded that the scale of development proposed could be considered a new settlement, which should only be proposed as part of a joint LDP, an SDP or Future Wales.

Catesby acknowledges that promotion of a site of this scale falls outside the scope of the RDLP. The site will be promoted through the emerging South East Wales Strategic Development Plan in due course. Catesby maintains that the site is capable of accommodating major development and that its promotion for strategic scale regeneration is entirely appropriate given its sustainable credentials and the contribution that it can make to the Vale of Glamorgan and wider Cardiff Capital Region. Catesby remains keen to working collaboratively with VoGC to bring forward development at Llandow in the medium to long term and looks forward to continuing the largely positive discussions that have taken place to date.

VISION AND STRATEGIC OBJECTIVES

The vision for the Deposit RLDP maintains that, by 2036, VoGC will provide housing growth which responds to the authority's growing population and caters for all. This should be shaped through successful placemaking, delivering diverse communities and ensuring that the Vale is a healthy and inclusive place for everyone.

VoGC identifies key themes and strategic objectives to deliver the vision of the Deposit RLDP. This includes "ensuring that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population", to address the accommodation needs of all the Vale's communities (Objective 3 - Homes for All). Objective 4 – Placemaking also seeks for new development to be appropriately located, contribute towards creating active, safe and accessible places, and protect and enhance the character of existing communities.

The provision of a mix of new homes is also crucial in fostering diverse, vibrant and connected communities in line with Objective 7. Consequently, physical, economic and social regeneration are facilitated, reflecting the needs and aspirations of local communities. Vital and vibrant rural communities are also provided through the delivery of growth in sustainable locations and supporting infrastructure.

Catesby broadly SUPPORTS the vision and strategic objectives of the Deposit RLDP to deliver a mix of high-quality new housing which responds to the authority's growing population, caters for all, and has placemaking at its heart. This new housing should be facilitated across the Vale in a variety of sustainable locations to best serve as many communities as possible.

SUSTAINABLE GROWTH STRATEGY

A key part of the Sustainable Growth Strategy for the Deposit RLDP is to deliver a sustainable level of housing growth which accords with the Vale's position within the Cardiff Capital Region (CCR). Specifically, the Deposit RLDP makes provision for a housing requirement of 7,980 dwellings over the Plan period (526 dwellings per annum). The Deposit RLDP makes clear that this is both deliverable and ambitious, reflecting the Vale's position in the Future Wales national growth area. Crucially, the housing requirement will be achieved through a range of housing opportunities, to encourage existing residents to live and work in the Vale and encourage inward migration of new residents, at a level

commensurate with the CCR.

However, Catesby would suggest that this level of growth is still too low, taking into account the aspirations of Future Wales for the area and the latest population and household projections, which suggest a higher level of need is required for the Vale.
The Sustainable Growth Strategy also seeks for new and existing housing, employment, services and facilities to be co-located to reduce the need to travel. New housing development shall be specifically located in places that are already well served by existing and/or proposed services, facilities and employment opportunities. This includes, where appropriate, those offered by the business parks and industrial estates already established in the Vale. The Strategy also allows for regeneration opportunities on previously developed and under-utilised land.

The Key Diagram (Figure 1) identifies the proposed Strategic Growth Area (SGA), connectivity routes, key locations for future development, the Plan's hierarchy of settlements and interrelationships with adjoining local authorities.

Figure 1: Key Diagram

Catesby considers that the Minor Rural Settlements dispersed within the 'Connectivity' corridor, such as Llandow, should play a supporting role in accommodating housing growth, given their important range of services and facilities that reduce the need to travel. The Sustainable Growth Strategy also allows for small scale affordable housing led developments in Minor Rural Settlements, where appropriate.

Noting Llandow's accessible location and proximity to existing and emerging strategic employment opportunities, Catesby broadly SUPPORTS the Sustainable Growth Strategy insofar as seeking to achieve the housing requirement through a range of housing opportunities. This includes the co-locating of housing and employment growth, with a focus on established business parks and industrial estates.

Paragraph 5.14 notes that "where appropriate, the broad principle is that the spatial strategy should look to ensure that new housing is in places where employment opportunities already exist or are proposed." Catesby supports this principle, noting that the Llandow Airfield site offers the potential to deliver co-located residential and employment opportunities at scale, as identified within the promotion document submitted in support of its response to the call for Candidate Sites. This will remain a key aspiration of the site's future promotion via the emerging SDP.

However, Catesby reiterates that the housing requirement for the Vale should be higher, accounting for the aspirations of Future Wales for the area and the latest population and household projections. A more ambitious Growth Strategy is needed to accommodate this increased housing requirement.

POLICY FRAMEWORK

Policy SP1 - Sustainable Growth Strategy reiterates that the Plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that, outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.

In order to ensure that the minimum target figure is met, it is important that the Plan identifies a sufficient number of sites / housing allocations to meet both the short and longer term development needs. As previously stated, Catesby SUPPORTS the overall growth strategy across the Vale of Glamorgan contained in the Deposit RLDP. However, it is questioned whether or not there is sufficient land allocated to deliver the growth required.

Of the overall housing target of 7,890 dwellings, approximately half of these are to be delivered via rolled forward allocations and extant consents. Whilst some such sites can be expected to come forward, Catesby would caution against the over-reliance on delivery of historically allocated sites.

Catesby suggests that VoGC considers the inclusion of additional sites to deliver the predicted growth strategy identified in the RLDP. This will strengthen the land supply position ensuring a robust RLDP can be adopted which has the ability to ensure the delivery of the necessary growth. Catesby supports growth along the 'Connectivity' corridor, particularly in Minor Rural Settlements such as Llandow to assist with this.

Policy SP2 – Settlement Hierarchy broadly distributes development in line with the hierarchy of settlements, reflecting the role and function of places and directing growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision. Llandow is identified as a Minor Rural Settlement, new development associated with which should be mainly limited to infill opportunities and small-scale affordable housing led schemes (sites of up to 25 dwellings with a minimum of 50% affordable provision).

Catesby would suggest that specific sites in and around all settlement types may be suitable for a greater level of development than that suggested by the settlement hierarchy, and these should be explored accordingly. As part of this, Catesby SUPPORTS the recognition in the Policy Framework that the existing services and facilities in and around the Minor Rural Settlements should be safeguarded, supported and enhanced, and that in order to do this, growth should still be balanced in a way which supports these rural communities (Paras 6.16 and 6.17).

Policy SP3 – Development in the Countryside is clear that development will only be permitted in the countryside where it falls within one of the specified uses. This only includes Affordable Housing Exception Sites in respect of housing development. Catesby suggests that further development sites are required across the Vale in order to meet the Council's housing requirement, which should consider locations within the countryside where appropriate.

Catesby reiterates that the co-location of housing with existing infrastructure and facilities will be crucial to achieving the overall Growth Strategy of the RLDP. Development in and adjacent to Minor Rural Settlements is also key to this, especially those located in proximity to the 'Connectivity' corridor on the Key Diagram.

Catesby SUPPORTS development within these locations, particularly at Llandow. This is key in order for the Vale of Glamorgan to achieve part of its overarching vision, which states that "growth within rural settlements has provided for the needs of residents and supports balanced multi-generational communities that contribute to the vibrancy of the rural area".

SUMMARY

We trust that the above representations can be considered duly made and look forward to receiving confirmation accordingly. Catesby welcomes the opportunity to comment further as the RLDP progresses through to adoption. Catesby looks forward to engaging with the Council over the months ahead to continue a dialogue regarding the future delivery of development at Llandow. If you require any further information, please do not hesitate to contact me on the details below.

Change suggested by respondent:

Catesby suggests that further development sites are required across the Vale in order to meet the Council's housing requirement, which should consider locations within the countryside where appropriate.

Catesby reiterates that the co-location of housing with existing infrastructure and facilities will be crucial to achieving the overall Growth Strategy of the RLDP. Development in and adjacent to Minor Rural Settlements is also key to this, especially those located in proximity to the 'Connectivity' corridor on the Key Diagram.

Sound: Not specified

Attachments:

Redacted Representation Form - https://valeofglamorgan.oc2.uk/a/3cc
Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/4sn

7016 Object

Document Element: SP3 – DEVELOPMENT IN THE COUNTRYSIDE
Respondent: Lidl GB Limited [1459]
Agent: CarneySweeney

Summary:

The settlement boundary, defined by Policy SP2, excludes allocation site SP12 'Land at Bridge House Farm, Llanmaes, Llantwit Major' which is for a retail foodstore. Instead, the draft allocation abuts, but lies outside, the settlement boundary as currently drawn. Although draft Policy SP3 states that "Areas outside settlement boundaries that are not allocated or protected for a specific use will be defined as countryside we consider the settlement boundary must be extended at this location to include the allocation. Its exclusion is illogical and would fail to reflect the 'on the ground' position when this allocation is delivered. Moreover, its exclusion could confuse and may constrain any future minor development changes at the site (e.g. those needed to meet operational needs the subject of any planning application). The draft proposals map shows the allocation as a dot which does not cover the full extent of the allocation. See below: See plan on attachment.
By not including the extent of the site/allocation within the defined settlement boundary, the draft plan fails to recognise the allocation will form an important part of the settlement, the delivery of which is crucial to meeting identified needs. Accordingly, we believe this fails Test 2 (Is the plan appropriate?), and it may fail Test 3 (Will the plan deliver) as its exclusion from the boundary may unduly impact the future site operation.

Full text:

Draft RCS2 sets out three criteria for new A1, A2 or A3 uses on new sites or existing retail areas which are as follows:
1. "It can be demonstrated that there is an additional need for the proposal which cannot be provided within an existing retail, commercial and service centre; and
2. The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.
3. The proposal would serve local needs in a neighbourhood or rural village."
We consider the policy should read as follows:
"1 It can be demonstrated that there is an additional need for the proposal which, when applying the sequential approach to locating development as outlined in national guidance, it has been demonstrated that the site is sequentially preferable; and
2 The proposal would not either individually or cumulatively with other recent or proposed consented developments have

an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.
3 Proposals serving only local needs should be of a scale and type which does not undermine the vibrancy, attractiveness and viability of neighbourhood centres."

The settlement boundary, defined by Policy SP2, excludes allocation site SP12 'Land at Bridge House Farm, Llanmaes, Llantwit Major' which is for a retail foodstore. Instead, the draft allocation abuts, but lies outside, the settlement boundary as currently drawn. Although draft Policy SP3 states that "Areas outside settlement boundaries that are not allocated or protected for a specific use will be defined as countryside we consider the settlement boundary must be extended at this location to include the allocation. Its exclusion is illogical and would fail to reflect the 'on the ground' position when this allocation is delivered. Moreover, its exclusion could confuse and may constrain any future minor development changes at the site (e.g. those needed to meet operational needs the subject of any planning application).
The draft proposals map shows the allocation as a dot which does not cover the full extent of the allocation. See below:
See plan in attachment
By not including the extent of the site/allocation within the defined settlement boundary, the draft plan fails to recognise the allocation will form an important part of the settlement, the delivery of which is crucial to meeting identified needs. Accordingly, we believe this fails Test 2 (Is the plan appropriate?), and it may fail Test 3 (Will the plan deliver) as its exclusion from the boundary may unduly impact the future site operation.

Lidl Great Britain Ltd objects to draft policy SP11 (Retail, commercial and service centre hierarchy) as worded as it fails to meet Test 2 (Is the plan appropriate?). Draft Policy SP11 sets out the proposed retail hierarchy (See extract below), but it does not accord with the settlement hierarchy as set out in draft Policy SP2 and it is not justified.
The adopted LDP Settlement Hierarchy lists:
Key Settlement: Barry
Service Centre Settlements: Cowbridge, Llantwit Major and Penarth
The adopted LDP Retail hierarchy lists:
Town centres: Barry
District centres: Barry (high street/broad street), Cowbridge, Llantwit Major, Penarth
Draft SP2 of the Deposit Plan identifies Cowbridge, Llantwit Major and Penarth as Service Centre Settlements in the Settlement Hierarchy.
However, draft SP11 lists a retail hierarchy as follows:
Town Centres – Barry (Holton Rd), Penarth, Cowbridge
District Centres – Barry (High Street), Llantwit Major
It is unexplained and unjustified that the SP11 retail hierarchy upgrades Cowbridge to Town Centre status, while Llantwit Major and Barry High Street remain District Centres.
The Deposit Plan includes two retail allocations, neither are intended to directly serve Penarth or Cowbridge. Cowbridge is not a focus for growth. It is therefore unjustified that Llantwit Major, which is served by a train station, is a settlement roughly twice the size of Cowbridge (by population) and is a manifestly more sustainable location and more appropriate focus for growth, is proposed to rank below Cowbridge in the retail hierarchy. Barry, Penarth and Llantwit Major should rank as Town Centres as the most sustainable locations for growth.
Penarth is an accessible settlement and an appropriate focus for growth. Indeed, the Council's BP13 (Retail and Commercial Leisure Study (June 2023)) recommends a medium to large supermarket to serve Penarth (Zone 5) but the Deposit Plan is absent of any food retail allocation for Penarth/Llandough. In addition to Llantwit Major and St Athan (Deposit Policy SP12) Penarth should be a focus for additional convenience provision over the plan period.

SP12 – RETAIL FLOORSPACE PROVISION
Lidl Great Britain Ltd firmly supports the allocation within draft Policy SP12 (Retail Floorspace Provision) for 1,251sqm of convenience floorspace at Land at Bridge House Farm, Llanmaes, Llantwit Major. This allocation is needed to ensure the plan is sound, by addressing unmet need at Llantwit Major which is a Service Centre and focus for growth. This should be made clear in the reasoned justification.
In respect to Penarth, Policy SP12, together with supporting paragraphs 6.208–6.210, do not, however, adequately reflect the findings of the Council's Retail & Leisure Study (BP13). Policy SP12 should also plan positively for the identified convenience retail needs within Zone 5 (Penarth/ Llandough). BP13 confirms that Penarth District Centre is not served by a medium to larger supermarket (para. 9.2). The BP13 Study finds quantitative and qualitative capacity for a medium to larger supermarket by 2036 in Penarth (paras. 9.23, 12.24).
It finds overall quantitative convenience capacity of up to c.5,862sqm net floorspace (assuming deep discounter operators). In qualitative terms the following Centres have been identified in potential need for a medium to larger supermarket: Barry Holton Road town centre; Penarth district centre and Llantwit Major district centre. Quantitative and qualitative need is identified.
Despite the evidence of unmet need, the Deposit LDP Policy SP12 allocates only two sites for convenience retail totalling c. 3,109sqm net; one site at Llanwit Major and a second site at St Athan. This is below the overall (up to 4,282–5,862sqm net) requirement identified in BP13. The allocation of land at Llantwit Major aligns with the evidence base, has been thoroughly tested at application stage and this is fully supported.
Policy SP12 is silent on the need for additional floorspace at Penarth/Llandough (Zone 5) and as such does not reflect the evidence base findings and address identified need in Penarth, with a 'residual' quantitative capacity of c.1,173–2,753sqm net unmet/unallocated. We note Policy SP12 states that any additional convenience and comparison retail floorspace beyond that provided by the identified sites should be directed towards the town and district centres outlined in Policy SP11. However, this merely reflects national guidance in respect to directing growth to town/district centres (i.e. applying a sequential approach). The Policy should go further and seek to allocate the residual unmet need to

Penarth/ Llandough. We note the BP13 is silent on additional need at St Athan.
Planning Policy Wales (PPW) 12 requires LPAs to identify the appropriate form, scale and location to meet retail needs (para. 4.3.8) and emphasises ensuring communities have access to adequate retail provision (para. 4.3.13). PPW therefore places a duty on LPAs to plan positively for evidenced retail needs. In respect to Penarth/Llandough Policy SP12 should seek to address this requirement.
Under PPW and TAN4, LPAs must apply the sequential test, directing new retail development to locations that are:
• In-centre,
• Edge-of-centre, and only then,
• Out-of-centre locations that are accessible and well-connected to the catchment.
Penarth Centre is physically constrained. In the absence of any in-centre or edge-of-centre sites capable of accommodating a medium/larger supermarket, the next sequentially preferable option is the most accessible, well-connected site within the same catchment, capable of meeting identified need and reducing expenditure leakage.
Policy SP12 should plan positively for needs in Zone 5 (Penarth/Llandough) and include provision for a medium to large convenience foodstore in Zone 5 in accordance with BP13.
Enclosed with this representation is a separate representation (Under 8. New site submission) promoting a site for food retail development to meet identified needs within the Zone 5 Penarth/Llandough catchment. The site is considered accessible and sequentially preferable to meeting identified needs in Penarth.
The policy should be clear that identified need should be delivered in accordance with the sequential approach as set out in national guidance. As set out in Policy SP12 any additional convenience and comparison retail floorspace beyond that provided by identified sites should be directed towards the town and district centres in accordance with the sequential approach. We support that the inclusion of retail floorspace as part of a mix of uses on allocated sites will also be supported.

POLICY DNP2 – GREEN WEDGES
Lidl objects to the inclusion of land at Penlan Road, Llandough (see Site Location Plan, drawing no. 3744 F420) within the Green Wedge designation under Policy DNP2. The site forms a distinct and enclosed parcel of land on the north-eastern edge of the designated Green Wedge, and its physical characteristics demonstrate that it does not serve the strategic purposes of the wider designation.
The northern and western boundaries are formed by Llandough Hospital, including the hospital access road and surface car parking, which clearly separate the site from the wider Green Wedge. The southern boundary is defined by residential properties along Corbett Road and the Merrier Harrier public house. The south-western and western boundaries are formed by further residential properties within Llandough. As such, built development extends beyond the site in multiple directions, meaning it does not contribute to the open land between settlements that Green Wedges are intended to protect.
The site is physically and visually contained with strong, defensible boundaries. Its close association with existing built form means that it does not exhibit the level of openness required for Green Wedge designation under PPW or BP27. BP27 requires Green Wedge boundaries to include only land that must remain open in the long term. When assessed against the four-stage SE Wales Green Wedge methodology, the site performs weakly. In terms of openness (Stage A), the site has low perceived openness as it is enclosed by development. Under development pressure (Stage B), the influence of surrounding built form means the site is already urban in character. In relation to Green Wedge purposes (Stage C), the site does not materially contribute to preventing coalescence, safeguarding open countryside, or protecting the setting of an urban area. The conclusion (Stage D) is therefore that the site's inclusion within the Green Wedge is anomalous.
Recent decisions in the emerging RLDP, such as the allocation of HG1 KS2, demonstrate that selective Green Wedge boundary amendments are acceptable where supported by evidence. Not all areas within the current designation are equally sensitive, and the site represents one of the least sensitive parts.
The Council's own evidence further supports the suitability of the land for development. The site does not lie within the Special Landscape Area that covers much of the remaining Green Wedge, highlighting its lower landscape sensitivity. The Candidate Site Assessment (BP18a examined the wider parcel (Site ID 400) for housing and concluded that it would form a natural extension to the Llandough settlement boundary. It noted that the land would represent an incursion only if less sensitive sites could not be delivered and discounted the site solely because housing need had been met elsewhere, not due to landscape or Green Wedge harm. This confirms the Council recognises the land is capable of development. The same land can therefore appropriately meet other evidenced needs, including retail provision.
In separate representations, Lidl is promoting land to the south of Llandough Hospital via 'RDLP New site submissions'. It is considered that the site can be developed in a low-impact, landscape-led and sensitively designed manner that respects its transitional position between the urban edge and the wider Green Wedge. A modest single storey medium sized foodstore delivers a built form that can sit comfortably below surrounding tree lines and hospital structures. A comprehensive landscape strategy, including reinforced boundary planting, native woodland edge enhancement, and carefully designed building can soften building edges, strengthen the site's defensible boundaries, and integrate the scheme with its surroundings. The development would therefore appear as an infill of the existing urban area, rather than any intrusion into the open countryside, and can be designed to maintain the wider Green Wedge's openness and character by delivering a strong defensible physical boundary which prevents any further development beyond the site.
As set out in separate representations the Council's Retail and Leisure Study (BP13) identifies a clear quantitative and qualitative need for a medium to larger supermarket within Zone 5, alongside notable levels of convenience expenditure leakage to Zone 3 (Cardiff). The promoted site is well positioned to intercept this leakage, meet the identified convenience floorspace requirement, and provide improved local convenience retail provision for

Llandough/Penarth. There is, therefore, a clear needs-based justification for release of this parcel of land from the Green Wedge designation.
The Green Wedge boundary should be amended at this location to remove the promoted site from Policy DNP2 (Green Wedge designation) and from the Proposals Map. In parallel, the settlement boundary defined by Policy SP2 should be realigned to include the promoted site, reflecting the site's physical relationship with existing development, its defensible boundaries, and its suitability to meet an evidenced strategic retail need.

The Policy text should be changed as follows:
"Proposals involving the change of use at ground floor level uses from A1 retail use within Service Centres will permitted where the proposal would:…"
The Policy RCS1 (Resilient retail, commercial and service centres) supporting text adds new policy requirements which are not within the draft policy. Paragraph 6.214 states that:
"Changes of use class in Retail, Commercial and Service Centres must be justified by evidence that the property has been affected by a sustained period of long-term vacancy and that proactive marketing has been undertaken by a property agent for a minimum of 12 months in an effort to secure tenants. The marketing report should include:
• Details of the existing use or previous use if vacant;
• The length of time the unit has been vacant, if applicable;
• The type of use which the unit has been marketed for, what the marketing strategy involved and its duration;
• The amount of interest in the unit during the marketing period – this should detail the number of queries, the type of uses sought, and if known, the reason for not pursuing any initial enquiries."
However, nowhere in the draft policy wording does it explicitly state to include 12 months of marketing activity. The draft supporting text reads as though this is a policy requirement, rather than supportive guidance. This is contrary to caselaw which confirms that supporting text cannot be used to expand the policy beyond its wording (R (Cherkley Campaign Ltd) v Mole Valley District Council). A proposal could meet the requirements of the criteria sets out in draft policy RCS1 without being marketed for a minimum of 12 months. If the Plan is adopted as currently set out, there is a risk of internal inconsistency between policy RSC1 and the supporting text. Accordingly, this would fail Test 2 (Is the plan appropriate?) as it is not coherent or consistent.
We also have concerns with criterion 5 which states to "Avoid an over-concentration of non-retail uses that would undermine the retail function of the centre". This is because 'over-concentration' has not been defined within the draft policy. This contrasts with draft policy RCS3 which includes a definition of what an over-concentration of hot food takeaways would be. Without a definition of what an over-concentration of non-retail uses is, the draft policy will remain and lack clarity. Additionally, without a definition, the draft policy may fail Tests 2 and 3 as it is currently unclear (Test 2: Is the plan appropriate?) and cannot be effective (Test 3: Will the plan deliver?).

At present, we consider the Deposit Plan inadequately supports the Welsh language. Although the Welsh Language is included within Objective 6 (Embracing Culture and Heritage), the Deposit Plan does not contain a policy which seeks to promote the Welsh language, nor is the promotion of the Welsh language referenced in other Deposit Plan policies where this may be appropriate. Without a clear policy, applicants do not need to explicitly consider impact on the Welsh language so the role of the RLDP will be limited.
Local Development Plans should accord with national policy and guidance. For instance, the supporting text to Policy 1 of Future Wales states that "Key issues, including … the Welsh language, are core elements of policy 1 and are common threads underpinning all Future Wales policies." However, we believe that the Welsh language is not currently underpinning the policies within the Deposit Plan.
Additionally, paragraph 3.25 of PPW states that "The Welsh language is part of the social and cultural fabric and its future well being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. The land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its, use and the Thriving Welsh Language well being goal." Paragraph 3.29 goes on to suggest language impact assessments are required for "large developments not allocated in a development plan which are proposed in areas of particular sensitivity or importance for the language" with these areas defined in the LDP. In this instance, PPW sets out guidance for developers which is not present in the Deposit Plan.
The Vale of Glamorgan Council commissioned AECOM to produce the Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan (November 2025). Paragraph 9.5.9 recommends including a specific policy that supports and protects the Welsh language within the Deposit Plan. This contrasts with the Welsh Language (November 2025) Background paper, produced by the VoGC, which concludes that a specific Welsh Language policy is not warranted, albeit it does acknowledge the Plan's statutory duty to consider the Welsh language and embed relevant provisions within broader thematic policies. However, this is currently lacking as the Deposit Plan does not reference the Welsh language within other policies. Although the Background Paper considers that the RLDP is "unlikely to adversely affect the existing patterns of Welsh language use within the Vale of Glamorgan", the Plan should seek to promote the Welsh language.
Developers should be encouraged to promote the Welsh language where this may be reasonable and appropriate e.g. bilingual signage and announcements. Lidl actively promotes the Welsh language through their business. The Deposit Plan should be amended to strengthen the importance of the Welsh language, helping to meet Objective 6 over the RLDP period. Overall, without clear Welsh Language policy promotion, the Deposit Plan cannot positively impact the Welsh language. The Deposit Plan needs to go further.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rm
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rn
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4ry
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rp
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rq
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4sr

4863 Support

Document Element: SSC1 - DEVELOPMENT WITHIN SETTLEMENT BOUNDARIES

Respondent: Emma Reed [2653]

Summary:

Support the protection of open spaces within villages.

Full text:

Support the protection of open spaces within villages.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5910 Object

Document Element: SSC1 - DEVELOPMENT WITHIN SETTLEMENT BOUNDARIES

Respondent: Mr William Hart [1009]

Summary:

The new boundaries ignore the previously allocated green wedges. Green spaces to be kept free of development were identified previously and the whole concept of them has been ignored.

Full text:

The new boundaries ignore the previously allocated green wedges. Green spaces to be kept free of development were identified previously and the whole concept of them has been ignored.

Change suggested by respondent:

The plan should honour previously identified green wedges.

Sound: No

Attachments: None

6001 Object

Document Element: SSC1 - DEVELOPMENT WITHIN SETTLEMENT BOUNDARIES
Respondent: Mr Rob G Thomas [683]

Summary:

VoGCC RLDP and Policy SSC1
BP46 Page 35
Item: Land at Rose Cottage
Colwinston, change ref.3
Type of change 1B

No justification to change boundary here.
Not rounding off
Impact on highway and the dangerous junction.
The Property has been for Sale for years and thus inclusion could result in further inappropriate development to an already expanded and converted small cottage if settlement boundary is changed.
Impact on Conservation area .
Impact on visual Amenities.

Full text:

VoGCC RLDP and Policy SSC1
BP46 Page 35
Item: Land at Rose Cottage
Colwinston, change ref.3
Type of change 1B

No justification to change boundary here.
Not rounding off
Impact on highway and the dangerous junction.
The Property has been for Sale for years and thus inclusion could result in further inappropriate development to an already expanded and converted small cottage if settlement boundary is changed.
Impact on Conservation area .
Impact on visual Amenities.

Change suggested by respondent:

Delete this Boundary change here as unnecessary and contradictions to VoGCC policies and methodology for Conservation areas

Sound: No
Attachments: None

6123 Object

Document Element: SSC1 - DEVELOPMENT WITHIN SETTLEMENT BOUNDARIES
Respondent: Ms Lucie Taylor [2506]

Summary:

When referring to protecting open space there should be reference to protecting active community managed green spaces. Open spaces can be formal and informal but either way, their merits are just as valuable.

Full text:

When referring to protecting open space there should be reference to protecting active community managed green spaces. Open spaces can be formal and informal but either way, their merits are just as valuable.

Change suggested by respondent:

refer to the need to protect informal open spaces that have active community managed initiatives on site

Sound: No
Attachments: None

6772 Support

Document Element: SSC1 - DEVELOPMENT WITHIN SETTLEMENT BOUNDARIES
Respondent: Persimmon Homes (East Wales) [1068]
Agent: Boyer Planning

Summary:

Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes

which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable

homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.
Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.
In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales

Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority. Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-

based estimates of additional housing need (Dated 12th February 2026).
Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.
Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual
As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement
From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.
Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.

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

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

Policy SP2 – Settlement Hierarchy

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

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

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

Policy SSC1 – Development within Settlement Boundaries

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

Policy SP4 – Placemaking

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

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

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

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

Policy PGD1 – Creating Well Designed and Inclusive Places

Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.

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

Policy PGD2 – Residential Development Densities

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

dwellings per net hectare in Minor Rural Settlements.
From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes,

representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.

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

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

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

Policy HG1 (B) – Housing Allocations

HG1 (3) Barry - Land at Hayes Lane

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

Unsustainable Location & Poor Connectivity

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

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

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

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

Loss of Allocated Employment Land

Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable

parts of the region which would not be in the interests of good placemaking as per PPW12.
Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
Policy HG3 – Housing Led Redevelopment Opportunity
Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
Policy SP7 – Affordable Housing Provision
In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
Policy SP8 – Affordable Housing Requirements

Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.
Policy SP10 – Sustainable Transport
Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.
In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
Policy TR1 – Transport Proposals
Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.
In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.
Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.
Policy SP13 – Community Infrastructure and Planning Obligations
Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
Policy CI1 – Open Space Provision
Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.
The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.
Productive and Enterprising Places
Policy CC1 – Residential Operational Net Zero Carbon Development
Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.

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

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

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

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

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

Distinctive and Natural Places

Policy SP19 – Green Infrastructure

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

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

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

Policy SP20 – Biodiversity and Ecosystem Resilience

In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Policy DNP1 – Special Landscape Areas

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

Policy DNP2 – Green Wedges
Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.
Policy DNP8 – Severn Estuary Recreational Pressure
Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
Conclusion
Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes' most pertinent comments on the consultation document are summarised below:
• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

6965 Support

Document Element: SSC1 - DEVELOPMENT WITHIN SETTLEMENT BOUNDARIES

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection

points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
Our representations on the site allocations are included in appendix 2.
We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the 'domestic' supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.
Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site
Our representations on site allocations are provided in the table below. The following caveats are applicable to all sites:
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion.
• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and

Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
The following provisions are applicable to all allocated employment sites:
• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
• Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcements.
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

4864 Object

Document Element: SP4 - PLACEMAKING

Respondent: Emma Reed [2653]

Summary:

I believe place making should occur in all settlements, including Rhoose, before major developments are approved. The community has not been involved but has been informed. Initial comments were summarised by officers rather than genuinely considered. Plan making should be community-led to ensure local acceptance, but the current drafts have failed to do so. Despite feedback, no positive changes have been made, except increasing housing on the Readers Ways site to balance the books.

Full text:

Place making should happen in all settlements before major developments are permitted. This includes Rhoose. The community have not been involved in this plan rather told it is happening. Even comments made on the first drafts for Rhoose were reported as what the officer felt were the themes. Plan making needs to start from the bottom up not be enforced down for there to be local acceptance. Communities need to be heard. The drafts of this plan have not done that and regardless of comments no positive changes (except to increase housing numbers on the Readers Ways site to make the books balance!)

Change suggested by respondent:

Rhoose to have a place plan before any further development is approved.

Sound: No

Attachments: None

5067 Object

Document Element: SP4 - PLACEMAKING

Respondent: Mr Shayne Wilford [2132]

Summary:

Placemaking is a joke. This policy destroys existing communities. There can be zero benefit from imposing huge inner city density housing estates on the green outskirts of smaller communities with little or no infrastructure or facilities. The resulting gridlock and poorer air quality together with the destruction of green spaces and hedgerow habitats can never be undone. History shows that all developments of this nature result in isolated communities and commuter brick box deserts. There is nothing of benefit to existing communities.

Full text:

Placemaking is a joke. This policy destroys existing communities. There can be zero benefit from imposing huge inner city density housing estates on the green outskirts of smaller communities with little or no infrastructure or facilities. The resulting gridlock and poorer air quality together with the destruction of green spaces and hedgerow habitats can never be undone. History shows that all developments of this nature result in isolated communities and commuter brick box deserts. There is nothing of benefit to existing communities.

Change suggested by respondent:

The Authority need to revise their ideological fantasy policies around creating communities and active travel and recognise what happens in the real world outside of their offices and computers. We recognise the need for housing but better use of brownfield sites where more high-rise could be built together with smaller (max 100) developments that will have less local impact and therefore more community acceptance and nicer places to live..

Sound: No

Attachments: None

5906 Object

Document Element: SP4 - PLACEMAKING

Respondent: HBF (Mr Mark Harris) [538]

Summary:

The HBF objects to the phrase at para 6.33 'Development will be favoured'.

The following wording should be added at an appropriate point: 'the Placemaking Statement should be proportionate to the scale of the development proposed.'

Remove the requirement for a placemaking statement.

Full text:

The HBF objects to the phrase at para 6.33 'Development will be favoured'. Community engagement is already included in the planning process, and consultations take place during the LDP at various stages, so any development on an allocated site will have already been consulted on. There is also a requirement for a PAC to take place prior to an application being submitted and statutory consultation by the LPA once the application is submitted. If the place plans cover the application site, these have also undergone consultation. There is no justification for the LPA to suggest that one application will be favoured more, just based on the level of additional consultation which has taken place.

Para 6.34 The following wording should be added at an appropriate point: 'the Placemaking Statement should be proportionate to the scale of the development proposed.' The type of placemaking that can be achieved on each site varies considerably for several reasons, including the size/scale of the development.

The HBF objects to the requirement for a 'place-making statement' as it is unnecessary; all of the information required is already required to be included in a Design and Access statement, which is a mandatory requirement of a planning application. The requirement for unnecessary additional documentation solely adds delays to the planning process.

Change suggested by respondent:

Amend the wording of the supporting text and policy accordingly.

Remove the requirement for a placemaking statement.

Sound: Yes

Attachments: None

6010 Object

Document Element: SP4 - PLACEMAKING
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:

Policy SP4 requires “Placemaking Statements” for “all major developments”. It is observed that supporting paragraph 6.34 of the RLDP states that “Major development proposals6 must be supported by a Placemaking Statement to demonstrate clearly how proposals for new development will achieve placemaking. This Placemaking Statement should form part of the Design and Access Statement that will be a requirement for most major planning applications.”

It should be made clear in the wording of Policy SP4 that Placemaking Statements are not expected to be standalone documents as per supporting paragraph 6.34 of the RLDP.

Full text:

Policy SP4 requires “Placemaking Statements” for “all major developments”. It is observed that supporting paragraph 6.34 of the RLDP states that “Major development proposals6 must be supported by a Placemaking Statement to demonstrate clearly how proposals for new development will achieve placemaking. This Placemaking Statement should form part of the Design and Access Statement that will be a requirement for most major planning applications.”

It should be made clear in the wording of Policy SP4 that Placemaking Statements are not expected to be standalone documents as per supporting paragraph 6.34 of the RLDP.

Change suggested by respondent:

Policy SP4 should therefore be amended as follows:

“…Placemaking Statements will be required as part of Design and Access Statements for all major developments setting out how the proposal accords with Placemaking Principles…”

This amendment is necessary to ensure that Policy CI1 meets the second test of soundness (Is the Plan appropriate?).

Sound: No
Attachments: None

6084 Object

Document Element: SP4 - PLACEMAKING
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:

Policy SP4 requires “Placemaking Statements” for “all major developments”. It is observed that supporting paragraph 6.34 of the RLDP states that “Major development proposals must be supported by a Placemaking Statement to demonstrate clearly how proposals for new development will achieve placemaking. This Placemaking Statement should form part of the Design and Access Statement that will be a requirement for most major planning applications.”

It should be made clear in the wording of Policy SP4 that Placemaking Statements are not expected to be standalone documents as per supporting paragraph 6.34 of the RLDP.

Full text:

Policy SP4 requires “Placemaking Statements” for “all major developments”. It is observed that supporting paragraph 6.34 of the RLDP states that “Major development proposals must be supported by a Placemaking Statement to demonstrate clearly how proposals for new development will achieve placemaking. This Placemaking Statement should form part of the Design and Access Statement that will be a requirement for most major planning applications.”

It should be made clear in the wording of Policy SP4 that Placemaking Statements are not expected to be standalone documents as per supporting paragraph 6.34 of the RLDP.

Change suggested by respondent:

Policy SP4 should therefore be amended as follows:

“…Placemaking Statements will be required as part of Design and Access Statements for all major developments setting out how the proposal accords with Placemaking Principles…”

This amendment is necessary to ensure that Policy CI1 meets the second test of soundness (Is the Plan appropriate?).

Sound: No
Attachments: None

6112 Object

Document Element: SP4 - PLACEMAKING

Respondent: Mr William Hart [1009]

Summary:

High density housing should be avoided. People have to live in them. Developers need to find ways of accomodating all people in comfortable housing. Once they are built, high density housing schemes will be around for a long time to the detriment of other residents.

Full text:

High density housing should be avoided. People have to live in them. Developers need to find ways of accomodating all people in comfortable housing. Once they are built, high density housing schemes will be around for a long time to the detriment of other residents.

Change suggested by respondent:

Mention of high density housing should be removed.
"Supports Public Transport" should be replaced with "Ensures adequate public transport is available, providing subsidies where necessary".

Sound: No

Attachments: None

6617 Comment

Document Element: SP4 - PLACEMAKING

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Policies that support the role of a Designing out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD)
Planning Policy Wales (PPW)
Technical Advice Note (TAN) 12: Design
Section 17 of the Crime and Disorder Act 1998
Violence against women and Girls
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public
The Terrorism (protection of premises) Act 2025 (Martyn's Law)
Standard Tier and Enhanced Tier
Public Spaces

South Wales Police ask that all new developments are built to Secured by Design standards and that they work with The Vale of Glamorgan planning Department at the pre planning stage.
It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred to the designing out crime at the pre planning stage.
Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025.
When planning parks and community space. Public consultation should take place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.
We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the

plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.
Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.
Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the

House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where "qualifying activities" take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states 'The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.'
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.

2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery. Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)
identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.
South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment

Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.

• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built

to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where

redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

6715 Comment

Document Element: SP4 - PLACEMAKING

Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are
included as one of the principles.

The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local diets, biodiversity, and community engagement.

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning
guidance (SPG) proposed. We are keen to ensure that these SPG's are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are
involved in the development of some of these. The content and application of the SPG's will be fundamental to the effectiveness of several of the policies identified in the
deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community
amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient
communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: "The Local Development Plan will support resilient and sustainable
local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part
of sustainable growth."

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local
diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

"Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other
opportunities for local food production as part of multifunctional green infrastructure."

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their
proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative
impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

6.54 We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live
full, productive and prosperous lives.'

6.60 We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid
HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to
ensure Developers submit a quality HIA and implement the conclusions.

6.61 Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

6.62 Wales Health Impact Assessment Support Unit has recently released guidance on HIA - see https://phwwhocc.co.uk/whiasu/ for more information and toolkits to ensure most up to date is in use.

6.63 Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the community..'.

6.65 Suggestion to change wording from 'encouraged' to 'expected' for example:
Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement
for HIA will assist with this expectation.

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference “enhancements to leisure, sport and recreation spaces”. Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation. It is recommended that the Key Site schedules include minimum on-site provision standards and delivery
phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population
growth.

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail
centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer
supply chains. This limits opportunities for strengthening local food economies.
It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for ‘local affordable food’ outlined in SP5.

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach.”

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to
consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and
Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: “Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food
infrastructure within walking distance of new residential areas.” This addresses diet related health inequalities, encourages healthier communities and aligns with HIA
guidance.

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply
chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable
agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models.

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses - to include the following wording: “Rural diversification proposals that support agro-ecological farming, sustainable local food production,
community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations.”

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel
Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022
01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing
flooding and making use more comfortable during hot weather (such as shading from trees). We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

SP13 Community infrastructure and planning obligations:

We want to take this opportunity to highlight the challenges that population growth places on healthcare services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure. Please refer to the information provided as part of the background evidence paper titled 'BP37
Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within
existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new
developments to take forward its strategic objectives.

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space Assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres. Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.”
There is no reference to the expectation that local communities are consulted in relation to the development of community facilities. We would like to see a
requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and
challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities
that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales’ push for local supply resilience, this is a major opportunity gap. Consider including the following wording:

“Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains.” This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or
urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: “Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing.”

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food
production, short supply chains or sustainable farming practices.
Consider including the following wording: “Development proposals should encourage short supply chains, low-carbon farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives.”

Change suggested by respondent:

Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

"Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other
opportunities for local food production as part of multifunctional green infrastructure."

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

6773 Support

Document Element: SP4 - PLACEMAKING

Respondent: Persimmon Homes (East Wales) [1068]

Agent: Boyer Planning

Summary:

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

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):

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

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.

Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to

acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.
Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.
In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include

ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar

implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.
Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual
As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement
From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates

a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.
In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.
Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.
Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.
Policy SSC1 – Development within Settlement Boundaries
Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.
Policy SP4 – Placemaking
In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.
In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car. Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.

The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.
Policy PGD1 – Creating Well Designed and Inclusive Places
Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.
On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and

clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On

the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
Loss of Allocated Employment Land
Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
Policy HG3 – Housing Led Redevelopment Opportunity
Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
Policy SP7 – Affordable Housing Provision
In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing

requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
Policy SP8 – Affordable Housing Requirements
Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.
Policy SP10 – Sustainable Transport
Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.
In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
Policy TR1 – Transport Proposals
Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.
In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.
Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.
Policy SP13 – Community Infrastructure and Planning Obligations
Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required.

This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.

Policy CI1 – Open Space Provision

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

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

Productive and Enterprising Places

Policy CC1 – Residential Operational Net Zero Carbon Development

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

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

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

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

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

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

Distinctive and Natural Places

Policy SP19 – Green Infrastructure

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

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

The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is

reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.

Policy SP20 – Biodiversity and Ecosystem Resilience

In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Policy DNP1 – Special Landscape Areas

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

Policy DNP2 – Green Wedges

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

Policy DNP8 – Severn Estuary Recreational Pressure

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

The policy also provides no clear threshold or criteria for determining what level of activity would constitute “visitor pressure” or an “adverse impact” on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.

From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan’s ability to meet its housing requirements and risk finding the RLDP unsound.

Conclusion

Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes’ most pertinent comments on the consultation document are summarised below:

• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.

• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

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

• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan’s ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

• Whilst Persimmon welcome the majority of the proposed planning policies from a development management

perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

6906 Support

Document Element: SP4 - PLACEMAKING

Respondent: Barratt Redrow Homes [2669]

Agent: Boyer Planning

Summary:

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

Full text:

1. INTRODUCTION
1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.
1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:
• Section 3 – The Vale of Glamorgan Key Characteristics;
• Section 4 – RLDP Key Themes, Vision, and Objectives;
• Section 5 – Sustainable Growth Strategy; and
• Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.
1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS
Settlement Pattern
2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.
2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

Housing Need
2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
3. RLDP KEY THEMES, VISION, AND OBJECTIVES
3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.
Key Themes
3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered

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

4. SUSTAINABLE GROWTH STRATEGY
Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor,

it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of

provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

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

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

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

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

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

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

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

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

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

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

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus

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

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

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

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

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

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

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

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

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

Policy SP2 – Settlement Hierarchy

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

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

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

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

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

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

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available.
5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.
Policy SP4 - Placemaking
5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.
5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.
5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.
5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.
5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
Policy PGD1 – Creating Well Designed and Inclusive Places
5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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Unsustainable Location & Poor Connectivity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the

Council's ability to meet the region's employment needs up to 2036.
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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.
• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.
• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.
• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.
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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
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• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary

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

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

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).
• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By

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

• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.

• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.

• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:

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

i. Space heating demand less than or equal to 40kWh/m2/year;

ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.

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

• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.

• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.

• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.

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

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

ii. Energy use intensity less than or equal to 40kWh/m2/year; and

Policy SP13 - Community Infrastructure and Planning Obligations

Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

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

Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and

e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
•
• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
•
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• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
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CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

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

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

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

6942 Support

Document Element: SP4 - PLACEMAKING

Respondent: Penarth Town Council (Mr Pete Newton, Principal Policy, Innovation and Development Officer) [1125]

Summary:

Members also felt similar about the inclusion and consideration of sustainable development through the specific strategy outlined in section 5 of the document and felt this linked in well with ongoing Placemaking work and its strategic approach as detailed in SP4.

Full text:

Penarth Town Council Deposit RLDP Consultation Response

Comments collated at a meeting of the Council's Consultation Task and Finish Group on 9th February 2026

Some Members attended the RLDP consultation drop-in session in Penarth and in general found it to be very informative.

Members support the general development strategy but did note the lack of information concerning discussions with adjacent and other nearby Principal Councils in the CJC Region. In view of the forthcoming Strategic Development Plan, encompassing the ten authorities, members felt that some further commentary regarding this is warranted.1

It is clear that the approach taken in the Cardiff paper is still that ideally, each Council is self-contained and "consumes its own smoke," which does not show any wider strategic thinking between the ten authorities in preparation for a regional Strategic Development Plan.

Members agreed with the view that infrastructure to support new housing developments was required in order to create successful developments, although they acknowledged that logistically it was difficult to pre-empt demand for some services such as travel and health services. Members also noted that predicting developmental needs and opportunities within wider context surrounding the UK's economic, political, and social landscapes.

Members noted that there was not much focus on Penarth or identified potential future development for Penarth beyond that already underway at the location near to Cosmeston but welcomed flexibility in its approach. Members expected to be more closely involved in the decisions and planning of this, and other such developments, and provide opportunity for wider consultation where appropriate, such as pre-application consultations, as well as would expect to be included in consultations concerning sites adjacent to Llandough, Dinas Powys, and Sully given their impact upon the town.

Penarth as a town is currently developed to its boundaries, save for the development at Cosmeston. It is, therefore, more dependent than other Service Centres on windfalls of land or buildings which may arise during the currency of the Plan. In 2023, an extensive assessment of the potential of the town concluded the following:

"There is marginally less capacity in Penarth [and Llandough] than the projected figures. However, this does not mean that the projections are incorrect or unjustifiable. The reported figures have not included a significant amount of capacity on open space land, and the projected figures for conversion of existing buildings and intensifications will be surpassed if the extant consents that exist this early in the Plan period are implemented."

The degree of flexibility, however, is substantially depending on one large site. P009, Headland School, is identified as both a potentially disused building and as a site with a capacity of 111-120 units. This special school is full to capacity and used by many Council in both Wales and England.

Members did note the inclusion of Cogan Transport Interchange under section 6.196 but would have liked to see more information about its future developments as they see it as key to increasing public transport use to Barry and further to West Wales in general.

Members wished to advise that issues with both the bridge and the platforms at Cogan have been long term, with accessibility being central to these issues. Members felt that improvements to accessibility should be a priority at this site, with planting and landscaping considered secondary to this.

Members felt it was key to consider the additional stress on Penarth from increased anticipated demand of public transport needs and emphasised the need for this to be aptly considered by bus route providers as part of development work.

Members wanted to see a strategy that actively protects the town's heritage and culture whilst still being able to provide for current and future generations.

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16 and section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report2, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Under CC2, it was noted that the presumption against demolition3 in favour of retrofit and reuse may constrain maximum transition to net zero as, whilst there is grant aid available for public buildings and social housing, the retrofit monies available for private stock is limited.

Additional considerations will also need to be made as part of the Third Carbon Budget (2026-2030), Local Area Energy Plans and the climate change ISA theme.

Members also felt similar about the inclusion and consideration of sustainable development through the specific strategy outlined in section 5 of the document and felt this linked in well with ongoing Placemaking work and its strategic approach as detailed in SP4.

Members were pleased to see mention of the diversification of high streets, although noted that Penarth was above average in terms of occupancy. They hoped that the RLDP would be able to support the town centre and support other ways it could be improved, such as a fishmonger or identifying a site for a new Cemetery.

With Penarth classified as a Service Centre, they are identified as having a defined role. However, the decline of in-person retailing means that defining role is not that evident, and Members felt there is potentially a need to move away from the traditional retail role of Town Centres in favour of "repurposing, creating multifunctional, commercial, and service centres that meet the needs of the communities they serve" in line with Future Wales Town Centre First Policy. The term 'repurposing' suggests a stronger role for the public sector in enabling these new purposes, and Members felt that Placemaking Plans could be one potential framework for this.

Members felt that potential functional support that could be provided could include:
• The appointment of a Town Centre Manager
• Using supporting interventions such as an extension or reshaping of normal services such as Neighbourhood Services.
• Using existing or emerging new powers, such as compulsory purchases.

Members wished for the RLDP to facilitate the safeguarding of essential public services, including health, policing, fire and rescue in the town, which would help to develop the defining role of a Service Centre, and felt that specific reference to these would be beneficial.

Members supported the avoidance of coalescence with adjacent settlements through the reconfirmation of Green Wedges as it allows for relevant extensions to those settlements whilst allowing them to retain their identity.

Members noted that the Quiet Area provision under DNP6 only applies to Penarth and wished to know why this was the case.

Members advised that they welcomed further opportunity for consultation, particularly in relation to developments in the neighbouring Cardiff Bay area whilst acknowledging that this is not necessarily an RLDP concern.

Footnotes

1 There is an evidence paper concerning relations with Cardiff and a Statement of Common Ground with Bridgend. However, there is only a reference in the RLDP text to discussions with other regional Councils and not the paper itself. We would be grateful if you could provide the paper as it does impact on the soundness of this Plan.

2The UK Climate Change Committee's 'Progress Report: Reducing Emissions in Wales' highlighted the following aspects of import: Skills, Vehicle Charging Networks, Improving Recycling, Energy Plans, Decarbonising Public Buildings and Social Housing, and reducing Road transport Demand (Car-Kilometres).

3The UK Environmental Audit Committee (2022) noted that "the evidence we received consistently recommended that retrofit and reuse be prioritised over new build."

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3d5

7033 Object

Document Element: SP4 - PLACEMAKING

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the

constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of “areas of high ecological value” will also go some way towards resolving the points we raise.
Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.
Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.
This will ensure that development in the area:
• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of ‘High Ecological Value’ (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger “policy hook” within

Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
“the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale.”
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
“Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value”.
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term “high ecological value” in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan’s alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure
Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological
connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
"There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value".

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as 'search areas'). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to '6 broad habitat types' including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to '6 broad ecosystems' to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP's Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning

application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it "is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary".
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW's Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational
Pressure' within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs
clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only

to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

We suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its current reference to the Historic Environment.

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

7081 Support

Document Element: SP4 - PLACEMAKING

Respondent: Barratt Redrow Homes [2669]

Agent: Highlight Planning

Summary:

Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.

Full text:

Introduction

These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.

Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.

Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.

That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.

The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.

The remainder of these representations address the specific policies of the Deposit Plan.

Deposit Plan Plan Period Position: Object

Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.

On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.

Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.

Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part

Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.

Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking

villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.

Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.

Policy SP6 – Housing Requirement Position: Object

Barratt Redrow objects to Policy SP6.

Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.

PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:

"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."

The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:

"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.

5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.

5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."

Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:

• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;

• Does not actively seek to address the area's ageing demographic;

• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;

• Does not seek to leverage any of the investment into the region through the CCR City Deal;

• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and

• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.

In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than

planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any

chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.
Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part
Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented

sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.
That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.
There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.
The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.
In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.
Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.
The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be “informed” by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council’s latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan’s blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.
8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part
Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.
The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan’s supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;
• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and

delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.
The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency

across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.
Policy CI1 – Open Space Provision
Position: Support in principle / Object in part
Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.
The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.
There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.
Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should

say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.

In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment
We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow

who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7082 Comment

Document Element: SP4 - PLACEMAKING

Respondent: Barratt Redrow Homes [2669]

Agent: Highlight Planning

Summary:

The wording of the policy should better reflect the position already set out in the supporting text so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.

Full text:

Introduction

These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.

Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.

Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.

That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.

The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.

The remainder of these representations address the specific policies of the Deposit Plan.

Deposit Plan Plan Period Position: Object

Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.

On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.

Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.

Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part

Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.

Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.

This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.

St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.

Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:

"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)

Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:

St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by

the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.

PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:

"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."

The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:

"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.

5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.

5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."

Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:

• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;

• Does not actively seek to address the area's ageing demographic;

• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;

• Does not seek to leverage any of the investment into the region through the CCR City Deal;

• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and

• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.

In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.

That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.

The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.

This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies

affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing

and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.
Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part
Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.
That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.
There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix. The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.
In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the

overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.
Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.
The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.
8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part
Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.
The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;
• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.
The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3

years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green

infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.
Policy CI1 – Open Space Provision
Position: Support in principle / Object in part
Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.
The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.
There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.
Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains

that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and

deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment
We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.

• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

Amend wording of SP4.

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7098 Support

Document Element: SP4 - PLACEMAKING
Respondent: Barratt Redrow Homes [2669]
Agent: Turley

Summary:

We support the recognition that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.

Full text:

Policy SP1 - Sustainable Growth Strategy
Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor

from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.
It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.
In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"
Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be concentrated is supported.

Policy SP2 - Settlement Hierarchy
The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable. As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Policy SP4 - Placemaking
We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.
The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses... ' or to be developed at 'high densities... and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.
Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Policy PGDl - Creating Well Designed and Inclusive Places
There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether

this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy Cll - Open Space Provision
The wording of Policy Cll, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy Cll should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy Cll requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.

Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7099 Object

Document Element: SP4 - PLACEMAKING

Respondent: Barratt Redrow Homes [2669]

Agent: Turley

Summary:

The identification of high-level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.
It should be made clear in the policy that the 'Placemaking Statement' is not expected to be a standalone statement but will form part of a Design and Access Statement.
Paragraph 6.33 should be amended to note that consultation will be 'encouraged' or similar.
There is a degree of crossover and repetition between Policy PGD1 and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Full text:

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Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
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In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
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Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Policy PGDl - Creating Well Designed and Inclusive Places
There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It

continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green

corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy Cll - Open Space Provision
The wording of Policy Cll, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy Cll should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy CII requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

Amend Policy SP4.

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7228 Object

Document Element: SP4 - PLACEMAKING

Respondent: Ms Lynne Squires [3520]

Summary:

I am concerned that the Plan, as currently drafted, does not ensure new growth will support strong, healthy, and inclusive communities.
Until the Council provides clear evidence and enforceable measures addressing community cohesion, housing mix, and health impacts, I cannot have confidence that the Plan is sustainable or fair.
I am concerned that the Plan does not explain how new housing and growth will integrate with existing communities.
There is a risk that rapid development could strain local services, schools, and community spaces, and make it harder for neighbours to get to know one another.
I would like to see evidence that social infrastructure will keep pace with population growth and that communities will remain inclusive and connected.
I am concerned that clusters of affordable housing in certain areas could lead to pockets of social exclusion or limit access to opportunities.
The Plan does not explain how it will ensure a good mix of housing types and tenures across the Vale.
I ask that the Council provide evidence that housing allocations will support socially balanced, inclusive communities.
I am concerned about increased traffic, air pollution, noise, and the loss of green spaces affecting health and wellbeing.
The Plan does not provide clear commitments to protect or improve accessible green spaces or safe walking and cycling routes.
I would like to see evidence that the Plan has assessed the health impacts of growth and will take steps to mitigate them.

Full text:

1. Air Quality and Traffic
The RLDP has not been supported by a sufficiently robust, transparent and locally specific
evidence base in relation to traffic capacity, mitigation, air quality and sustainable transport delivery in Dinas Powys.
The Plan relies on high-level assumptions rather than detailed assessments of known local constraints, and it does not provide adequate certainty that necessary mitigation and sustainable transport measures will be delivered, funded and implemented in a timely manner.
As a result, there is a significant risk that the cumulative impacts of development will lead to increased congestion, adverse effects on air quality and a deterioration in the quality of life for existing and future residents.
Until these evidence gaps are addressed and clear, enforceable measures are put in place, the RLDP cannot be considered fully justified, effective or consistent with national policy in its application to Dinas Powys.
Traffic Capacity
I am concerned that the RLDP has not demonstrated that the existing road network in Dinas Powys can cope with the scale of development proposed. Roads and junctions within the village already experience significant congestion both at peak times and throughout the day, particularly along Cardiff Road, St Andrew's Road and the A4055.
The Plan does not provide clear or accessible evidence, such as detailed junction capacity assessments or peak-hour traffic modelling, to show that additional development will not worsen these problems. Without this information, I cannot be confident that growth can be accommodated without unacceptable impacts on daily travel, safety and quality of life.
Questions: Can the Council confirm that the existing highway network in Dinas Powys can accommodate the growth proposed in the RLDP without causing unacceptable congestion?
Can the Council provide evidence including junction capacity assessments and peak hour traffic modelling?
Mitigation Measures
Where development in Dinas Powys is likely to increase traffic, I am concerned that the RLDP does not clearly explain how congestion will be mitigated.
Mitigation measures are described in general terms, but there is little clarity on what will actually be delivered, when it will happen, or who will pay for it. There is also no clear reassurance that mitigation will be in place before development takes place.
I am concerned that traffic conditions could deteriorate further if development proceeds without effective safeguards.
Questions: For any development allocations in Dinas Powys that may impact congestion, what measures are proposed to mitigate these effects?
Are these measures fully funded, deliverable, and enforceable?
Air Quality Impacts
Increased traffic has clear implications for local air quality, particularly in residential areas and near schools and community facilities. I am concerned that the RLDP has not clearly assessed how the proposed growth in Dinas Powys will affect air quality, especially when the cumulative impact of multiple developments is considered.
The Plan does not explain how compliance with statutory air quality standards will be monitored or maintained as traffic levels increase. This creates significant uncertainty about potential impacts on public health and the local environment.
Questions: Has the Council assessed the likely impact of the proposed growth on local air quality in Dinas Powys, including cumulative effects?
How will the Plan ensure compliance with statutory air quality standards?
Sustainable Transport
While the RLDP refers to encouraging walking, cycling and public transport, I am not convinced that realistic alternatives to car/motor use will be delivered in Dinas Powys.
There is limited detail on specific improvements, timescales or funding for sustainable transport. Without frequent, reliable public transport and safe, direct walking and cycling routes, it is unlikely that car use will reduce in practice.
As a result, traffic growth and air quality impacts may be greater than the Plan assumes.
Question: How does the Plan/Council intend to ensure that sustainable travel options (walking, cycling, public transport) will be delivered and used to reduce traffic and air quality impacts in Dinas Powys?
Evidence Gaps

Overall, I am concerned that key evidence relating to traffic and air quality in Dinas Powys is either missing or insufficiently detailed. Without clear, locally specific assessments, it is difficult to understand how the Council can be confident that the Plan is sound or that its impacts on the community are acceptable.
Question: There are limitations in the transport and air quality evidence for Dinas Powys, how does the Council justify that the RLDP remains sound in light of these uncertainties?
2. Flood risk
I am concerned about the Replacement Local Development Plan (RLDP) and its impact on Dinas Powys, in relation to flood risk.
Dinas Powys already experiences surface water flooding, overloaded drains and pressure on local watercourses. Any new development must be proven to be safe and must not make these problems worse. At present, the RLDP does not give me confidence that this has been properly addressed.
Flood Risk Has Not Been Properly Resolved
Welsh Government policy (TAN 15) says new development must be safe from flooding for its lifetime and that flood risk should be dealt with when the Plan is written, not later on.
The RLDP appears to allocate sites that are affected by flood risk without clearly showing how they can be made safe. Instead, it relies on the idea that solutions will be worked out later when planning applications are submitted. As a resident, this is worrying, as there is no guarantee that those solutions will ever work or be delivered.
Questions: Can the Council explain how allocations within [or affecting] TAN 15 flood risk areas comply with TAN 15's requirement that development be flood-safe for its lifetime, rather than relying on mitigation to be designed later?
Where the Plan relies on mitigation to address flood risk, what evidence demonstrates that such mitigation is deliverable, funded, and capable of implementation within the Plan period?
Is it the Council's position that compliance with TAN 15 can be deferred to the planning application stage, and if so, how does that align with the requirement for strategic flood risk to be resolved at plan-making stage?
Lack of Clear Evidence Behind Flood Assessments
The flood studies supporting the Plan are not easy for a lay person to understand and do not clearly show that the full impact of new development has been properly assessed.
In particular, it is unclear whether:
• The combined effect of multiple new developments has been considered
• The worst-case impacts of climate change and heavier rainfall have been tested
• Flood risk to existing homes and streets has been fully taken into account
Without this information, it is hard to see how the Council can be confident that new development will not increase flooding in Dinas Powys.
Questions: What level of modelling underpins the SFCA, and can the Council confirm whether it assesses downstream and off-site impacts arising from cumulative
development?
Does the SFCA test a 'worst-case' climate change scenario consistent with current Welsh Government guidance, and if not, why not?
How does the SFCA move beyond a desktop exercise to demonstrate that individual allocations are genuinely developable without increasing flood risk elsewhere?
Too Much Reliance on Future Drainage Solutions
The Plan relies heavily on Sustainable Drainage Systems (SuDS) to manage surface water, but there is little evidence showing that these systems can realistically work on all proposed sites.
I am concerned that:
• There may not be enough space on sites for effective drainage
• Water will still end up flowing into already stretched drains and streams
• Long-term maintenance of drainage systems is unclear
If these systems fail or are not properly maintained, flooding problems could become worse over time.
Questions: What evidence does the Plan rely on to show that SuDS can be accommodated on all relevant allocations without loss of developable area or displacement of flood risk?
Has the capacity of receiving watercourses and drainage networks been assessed at a strategic level, or is this assumed to be resolved site-by-site?
How does the Plan address the cumulative impact of multiple SuDS systems discharging into the same catchment?
What mechanisms are proposed to secure long-term maintenance of SuDS, and where is this evidenced in the Plan?
Doubts About Whether Sites Are Truly Deliverable
Some housing numbers in the Plan appear to depend on sites that may only work if major flood prevention measures are put in place, I believe that Dinas Powys is an example of this.
• It is not clear which sites depend on such measures
• There is no clear timetable or funding in place
• There is no backup plan if flood mitigation does not happen
I am concerned that the Plan may be relying on sites that cannot realistically be developed.
Question: Can the Council identify which allocations are dependent on flood mitigation infrastructure, and where the delivery, timing, and funding of that infrastructure are set out?
If mitigation fails to come forward, what contingency does the Plan provide to ensure housing delivery does not rely on undeliverable sites?
How does the Plan demonstrate that housing numbers are not inflated by sites whose flood risk constraints may ultimately prevent development?
Where NRW has expressed concerns or conditions relating to flood risk, how has the Council reflected those concerns in policy or allocations, rather than deferring them to later stages?

Has any NRW advice been departed from, and if so, what is the evidence base justifying that departure?
Climate Change and Long-Term Safety
Flooding is likely to become more frequent and severe due to climate change. The Plan does not clearly show that new development in or around Dinas Powys will remain safe for decades to come, not just during the Plan period.
Residents need reassurance that today's decisions will not create long-term flooding problems for future generations.
Question: How does the Plan ensure resilience to increased rainfall intensity and flood frequency over the full lifetime of development, not just the Plan period itself? Does the Plan assume future flood defences or upgrades, and if so, where are those projects committed and funded?
For these reasons, I believe the RLDP has not properly resolved flood risk issues affecting Dinas Powys, I ask that the Council be required to:
• Properly address flood risk at the plan-making stage, not later
• Remove or review sites where flood risk has not been clearly resolved
• Provide stronger evidence that new development will not increase flooding for existing residents.
Until this is done, the Plan cannot be considered sound.
3. Wastewater Treatment
This objection relates to the proposed level of housing growth in Dinas Powys and whether the existing wastewater and sewerage system can safely and realistically support it.
I am concerned that the RLDP does not provide clear, settlement-specific evidence to show that wastewater treatment works and the local sewer network have enough capacity to accommodate the planned development, either now or within the Plan period.
Without this evidence, the Plan risks placing unacceptable pressure on already constrained infrastructure, increasing the risk of flooding and environmental harm.
Wastewater Treatment Capacity
The RLDP does not clearly explain whether the wastewater treatment works serving Dinas Powys has sufficient spare capacity to deal with additional development.
In particular, the Plan does not set out:
• how much wastewater the treatment works is currently allowed to treat (its "consented capacity"),
• how much spare capacity is actually available,
• when this information was last assessed, or
• whether this assessment has been formally confirmed by Dŵr Cymru Welsh Water.
Without this basic information, I lack sufficient information to understand whether the existing system is already close to capacity or whether it genuinely has room to cope with new development.
The Plan also does not clearly state how much additional wastewater would be generated by the new housing proposed for Dinas Powys, or how this compares with any available
capacity. This makes it impossible to judge whether the level of growth proposed is realistic.
There is no clear evidence that a Dinas Powys–specific assessment has been carried out. If the Council is relying on broad, county-wide modelling instead, this does not reflect local conditions or known issues within the village.
Sewer Network Constraints & Flood Risk
Many residents are already aware of problems with drainage, surface water, and sewer performance in Dinas Powys, particularly during periods of heavy rainfall.
However, the RLDP does not provide clear evidence on:
• existing sewer surcharging or flooding incidents,
• past or current problems with overloaded sewers, storm overflow activity affecting the area.
There is also no clear explanation of how the combined impact of multiple new development sites in Dinas Powys has been assessed together, rather than individually. This is especially concerning given the increasing frequency of intense rainfall linked to climate change.
Dinas Powys has known surface water and flood risk sensitivities, yet the Plan does not convincingly demonstrate that increased wastewater flows will not make flooding worse or lead to pollution of local watercourses.
I am concerned that problems will only become apparent after development has already taken place.
Deliverability & Infrastructure Planning
The RLDP does not identify any specific wastewater or sewerage upgrades needed to support the proposed growth in Dinas Powys.
Where upgrades may be required, the Plan does not explain:
• what infrastructure improvements would be needed,
• how much they would cost,
• who would pay for them, or
• when they would be delivered.
This creates significant uncertainty. I am concerned that development could go ahead before infrastructure is in place, leaving existing communities to deal with the consequences of overloaded systems.
There is also no clear explanation of how infrastructure will be phased to ensure that wastewater capacity is available before new homes are occupied, rather than relying on solutions being found later.
Role of the Statutory Undertaker – Dŵr Cymru Welsh Water
The Plan appears to rely heavily on future discussions with Dŵr Cymru Welsh Water at the planning application stage to resolve wastewater issues.
I am concerned that this approach puts off important decisions that should be made now, during the Plan-making process. National planning policy requires development plans to be based on a clear understanding of infrastructure capacity, not assumptions that problems can be fixed later.
Without clear, written confirmation from Dŵr Cymru Welsh Water that the proposed level of growth in Dinas Powys can

be accommodated, I believe the Plan lacks the certainty needed to be considered sound.
Soundness & Policy Compliance
Because the RLDP does not clearly demonstrate that wastewater infrastructure:
• is available,
• can be upgraded in time, and
• has a realistic and funded delivery plan,
I do not believe the Plan is effective, which is a key test of soundness.
The Plan also appears to conflict with Planning Policy Wales, which states that development should be directed to locations where infrastructure is already in place or can be secured.
Deferring wastewater solutions to a later stage does not meet this requirement.
If wastewater capacity problems cannot be resolved within the Plan period, I question why the level of development proposed for Dinas Powys has not been reduced to reflect real infrastructure constraints.
4. Green Space & Green Infrastructure
For the reasons set out below I consider that the RLDP is unsound in relation to green space and green infrastructure in Dinas Powys because it:
• Fails to justify the loss of existing green space or show that mitigation will be delivered;
• Lacks clear evidence on the quantity, quality, and accessibility of green space;
• Does not safeguard the integrity of green infrastructure networks;
• Provides no mechanisms to ensure timely delivery of green space alongside new development;
• Does not demonstrate that alternatives were properly considered through the Sustainability Appraisal.
Until these issues are addressed, there is no clear basis to conclude that the proposed growth in Dinas Powys can be accommodated without unacceptable impacts on local green spaces and the wider environment.
I urge the Council to carefully consider these concerns and provide further evidence or modifications to ensure that the Plan is effective, sustainable, and compliant with national planning policy
Protection of Existing Green Space
The RLDP does not clearly explain why any existing green spaces in Dinas Powys might be lost, or whether the loss is unavoidable.
I am concerned that the Plan does not demonstrate:
• that all alternatives to protect existing green space have been considered, or
• that any replacement or mitigation will be provided within or near the village.
Without this evidence, there is no assurance that valued local green spaces, which are important for recreation, biodiversity, and the character of the settlement, will be preserved. This is a serious omission that makes the Plan unsound in this respect.
Question: How does the Plan justify the loss of any existing green spaces in Dinas Powys? Has an assessment been carried out demonstrating that loss is unavoidable, and that adequate replacement or mitigation will be provided within or near the settlement?
Quantity, Quality, and Accessibility of Green Space
The RLDP does not provide clear, settlement-specific information about the amount, quality, or accessibility of green space for Dinas Powys residents.
It is unclear whether the standards being applied:
• meet national policy requirements,
• reflect the needs of the local population, or
• will be sufficient to support an increased population from new housing.
Without clear evidence, I cannot be confident that new development will maintain adequate recreational and amenity space for all residents.
Question: What evidence supports the quantity, quality, and accessibility standards for green space in Dinas Powys? How do these standards compare with national policy and the needs of the local population?
Green Infrastructure Network Integrity
The Plan does not explain how green infrastructure networks—including wildlife corridors, footpaths, cycleways, and recreational routes—will remain coherent and functional as new development comes forward.
There is a real risk that the proposed growth could fragment these networks, reducing connectivity for wildlife and limiting access to recreational spaces. I am concerned that the Plan does not set out measures to prevent these negative impacts.
• Question: How does the Plan ensure that green infrastructure networks in Dinas Powys, including wildlife corridors, footpaths, and recreational routes, remain coherent and functional despite new development?
Delivery and Implementation
The RLDP does not make it clear how green space provision will be delivered at the same time as development, rather than being left to later planning agreements or discretionary decisions.
Without clear delivery mechanisms, there is no certainty that new or replacement green space will be provided when needed.
This creates risk that residents will face reduced access to recreation, wildlife habitats, and open space for years after new homes are built.
• Question: What mechanisms are in place to ensure that green space provision in Dinas Powys will be delivered alongside development, rather than deferred to later discretionary planning stages?
Consideration in the Sustainability Appraisal
It is not evident that the Plan's Sustainability Appraisal has fully assessed the impact of proposed development on green space and green infrastructure in Dinas Powys.
There is no clear explanation of whether alternative development options were considered that would reduce the loss or

fragmentation of green spaces, and if so, why these
alternatives were rejected.
I am concerned that the lack of settlement-specific analysis weakens the credibility of the Plan and its ability to safeguard local environmental assets.
Question: Has the Integrated Sustainability Appraisal fully considered the impacts of proposed development on green space and green infrastructure in Dinas Powys?
Were alternatives considered that would reduce loss or fragmentation, and if so, why were they rejected?
5. Health & Wellbeing
Alignment with RLDP Policy SP6
The RLDP does not clearly demonstrate how proposed allocations and policies affecting Dinas Powys will achieve the health and well-being objectives set out in Policy SP6.
In particular, the Plan does not provide evidence that new development will:
• maintain or enhance access to green spaces,
• support active travel (walking, cycling, public transport), or
• deliver inclusive and safe public environments for all residents.
Without clear mechanisms to ensure these outcomes, it is unclear how the Plan will contribute to the creation of healthy, inclusive communities in line with its own strategic policy.
Question: How does the Plan ensure that proposed allocations and policies affecting Dinas Powys will deliver the health and well-being objectives set out in Policy SP6, including access to green space, active travel, and inclusive public environments?
Alignment with the Vale of Glamorgan Well-Being Plan
The RLDP does not clearly show how its proposals for Dinas Powys are consistent with the objectives of the Vale of Glamorgan Public Services Board Well-Being Plan, particularly in relation to:
• physical and mental health,
• health equity, and
• equitable access to green and recreational spaces.
There is no settlement-specific evidence demonstrating that new housing or other
allocations will support these well-being objectives, leaving a gap in the Plan's justification and effectiveness.
Question: How does the RLDP demonstrate consistency with the Vale of Glamorgan Public Services Board Well-Being Plan, particularly the objectives relating to physical and mental health, health equity, and access to green spaces in Dinas Powys?
Evidence for Health and Well-Being Outcomes
The Plan does not provide sufficient evidence that its spatial strategy, site allocations, or policies will produce measurable improvements in health outcomes for residents of Dinas Powys, particularly in areas where health needs are identified.
Without this evidence, it is impossible to determine whether the proposed development will genuinely support improved physical or mental health, reduce health inequalities, or provide accessible, high-quality spaces for recreation and social interaction.
Question: What evidence demonstrates that the Plan's spatial strategy, allocations, and policies in Dinas Powys will produce measurable improvements in health outcomes for residents, especially in areas of identified need?
Integration with the Sustainability Appraisal
The RLDP's Integrated Sustainability Appraisal (ISA) does not clearly demonstrate how health and well-being impacts have been addressed specifically for Dinas Powys.
There is limited information on:
• mitigation or enhancement measures to support healthy communities,
• the contribution of proposed allocations to active travel networks, or
• ways in which new development will improve access to green infrastructure or inclusive public spaces.
Without settlement-specific consideration, the ISA does not provide sufficient assurance that health and well-being outcomes will be achieved, nor does it demonstrate compliance with national planning policy on creating healthy and sustainable places.
Question: How has the Integrated Sustainability Appraisal addressed health and well-being impacts specifically for Dinas Powys, and what mitigation or enhancement measures are proposed to ensure alignment with national planning policy on healthy places?
6. Education & Medical Services
I believe that the RLDP is unsound in relation to education and healthcare services in Dinas Powys
Education Provision
The RLDP does not provide clear, settlement-specific evidence regarding school capacity in Dinas Powys.
My key concerns include:
• There is no demonstration that local primary and secondary schools have enough places for the children who will arise from the proposed housing.
• It is unclear whether the Plan relies on borough-wide estimates, which may overlook local pressures and result in shortages at specific schools.
• The Plan does not identify any specific improvements to school infrastructure (such as new classrooms, extensions, or new schools), nor does it set out funding, timing, or delivery mechanisms.
Without these assurances, there is no certainty that school places will be available before families move in, which could lead to overcrowding and diminished educational standards.
I am concerned that, in the absence of firm evidence and infrastructure commitments, the proposed scale of housing growth in Dinas Powys may be unsustainable and undeliverable.

Healthcare / Medical Services
The RLDP does not demonstrate that local healthcare services—including GP practices, dental services, and community health facilities—can accommodate the increased population.
My specific concerns include:
• There is no settlement-specific assessment of current or future healthcare capacity in Dinas Powys.
• The Plan does not indicate whether additional or expanded healthcare facilities will be provided, nor how this would be funded, phased, or secured alongside new housing.
• Without clear planning, the proposed growth could reduce access to essential health services for both existing and new residents, impacting physical and
mental health outcomes.
I am particularly concerned that increased demand without confirmed provision could lead to longer waiting times, reduced appointments, and pressure on local medical staff,
undermining the well-being of the community.
These gaps mean the Plan is not effective, justified, or consistent with national planning policy, which requires growth to be planned where infrastructure is available or can be secured.
7. Affordable Housing Allocation
I support the principle of providing affordable homes for local residents, especially young families, first-time buyers, and key workers who cannot afford market rates.
Well-planned affordable housing can help maintain a mixed and vibrant community and retain younger residents.
Affordable homes in Dinas Powys could reduce commuting pressures by allowing residents to live and work locally.
However, the RLDP does not provide clear evidence for how many affordable homes are needed in Dinas Powys or what types of homes are required for different groups (families, older residents, low-income households).
There is insufficient information about how and when affordable homes will actually be delivered alongside market housing.
Without clear delivery plans or safeguards, affordable homes may not remain genuinely affordable in the long term.
Concentrated or poorly planned affordable housing may put pressure on local schools, healthcare, transport, and green spaces, which are already constrained in Dinas Powys.
The Plan does not explain how affordable housing will be integrated with market housing to create sustainable, mixed communities rather than segregation or social imbalance.
Because of the lack of clear evidence, delivery mechanisms, and mitigation for potential negative impacts, I do not consider the Plan sound in terms of affordable housing in Dinas Powys.

8. Community Cohesion & Social Integration
I am concerned that the Plan, as currently drafted, does not ensure new growth will support strong, healthy, and inclusive communities.
Until the Council provides clear evidence and enforceable measures addressing community cohesion, housing mix, and health impacts, I cannot have confidence that the Plan is sustainable or fair.
Impact on Community Cohesion and Social Integration
I am concerned that the Plan does not explain how new housing and growth will integrate with existing communities.
There is a risk that rapid development could strain local services, schools, and community spaces, and make it harder for neighbours to get to know one another.
I would like to see evidence that social infrastructure will keep pace with population growth and that communities will remain inclusive and connected.
Risk of Over-Concentration of Affordable Housing
I am concerned that clusters of affordable housing in certain areas could lead to pockets of social exclusion or limit access to opportunities.
The Plan does not explain how it will ensure a good mix of housing types and tenures across the Vale.
I ask that the Council provide evidence that housing allocations will support socially balanced, inclusive communities.
Impacts on Mental and Physical Wellbeing
I am concerned about increased traffic, air pollution, noise, and the loss of green spaces
affecting health and wellbeing. The Plan does not provide clear commitments to protect or improve accessible green spaces or safe walking and cycling routes.
I would like to see evidence that the Plan has assessed the health impacts of growth and will take steps to mitigate them.
9. Climate Change & Sustainability
I am concerned that, as drafted, the Plan does not provide enough evidence or practical measures to ensure new development is sustainable and climate resilient. The RLDP is not fully justified, effective, or consistent with national policy on climate change and sustainability.
Key gaps include alignment with carbon reduction targets, enforceable delivery of low-carbon travel, energy-efficient homes, sustainable drainage, and climate-resilient infrastructure.
Without clear policies and enforceable commitments on low-carbon travel, energy-efficient homes, sustainable drainage, and climate-resilient infrastructure, the Plan risks harming both the environment and the wellbeing of communities.
Alignment with Welsh Government's Carbon Reduction Targets
I am concerned that the Plan does not explain clearly how new homes, workplaces, and other development will help Wales meet its legally binding carbon reduction targets.
Without this, there is a risk that growth in the Vale could increase emissions rather than reduce them. I would like to see evidence showing how this (and each) new development contributes to lowering carbon emissions.
Promotion of Low-Carbon Travel, Energy-Efficient Homes, and Sustainable Drainage

I am worried that the Plan relies too much on people walking, cycling, or using public transport without clear plans to make this happen.
There is also little information on whether new homes will be energy-efficient or if systems to manage rainfall and reduce flooding (like sustainable drainage) will be properly installed and maintained.
I want to see clear, practical measures to make low-carbon travel, energy-efficient homes, and safe drainage a reality.
Resilience of Infrastructure to Extreme Weather Events
I am very concerned about the impacts of extreme weather, including flooding, heatwaves, and storms, on roads, utilities, and homes.
The Plan does not clearly show how new developments or existing infrastructure will be designed to cope with these risks.
I would like to have assurance that any buildings, roads, drainage, and community facilities will be climate-resilient and protect people's health and safety.
10. Plan-making Process & Evidence Base
In my view, the RLDP is not fully justified or effective in its current form with respect to plan-making and the evidence base. Key gaps include accessibility and transparency of evidence, consideration of resident and stakeholder feedback, and robust monitoring and review
arrangements.
Without clear and accessible evidence, demonstrated consideration of local feedback, and robust monitoring and review mechanisms, residents cannot be confident that the Plan will be fair, effective, or responsive to changing circumstances.
Clarity, Transparency, and Accessibility of Evidence
The RLDP is not always clear and is not easy to access.
Technical reports, data, and assumptions are often difficult to find or understand, making it hard for residents to see why particular sites or policies were chosen.
The Council should provide accessible summaries and clear explanations so that everyone can understand and comment on the evidence.
Local Consultation and Consideration of Resident Feedback
I am concerned that residents' views may not have been fully taken into account in shaping the Plan.
It is unclear how consultation responses have influenced allocation decisions or policy wording.
I seek assurance that feedback from local people and community groups has genuinely informed the Plan, and that future consultations will be inclusive and clearly reported.
Monitoring and Review Mechanisms
The Plan does not clearly explain how progress will be monitored or how changes will be made if things do not go as planned. For example, if housing delivery is slower than expected or infrastructure is delayed, there is little information on how allocations or policies would be adjusted.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/twp
Representation Form Annex - Redacted - https://valeofglamorgan.oc2.uk/a/twq

4570 Comment

Document Element: PGD1 - CREATING WELL DESIGNED AND INCLUSIVE PLACES
Respondent: Mr David Barton [2683]

Summary:
Good highways with FREE CAR PARKING en masse otherwise people will be reduced to their own areas for life without a need to venture here or elsewhere which will hamper the economy irreversibly.

Full text:
Good highways with FREE CAR PARKING en masse otherwise people will be reduced to their own areas for life without a need to venture here or elsewhere which will hamper the economy irreversibly.

Change suggested by respondent:
as above mass free car parking and the removal of time-limited restrictions.

Sound: No
Attachments: None

4571 Comment

Document Element: PGD1 - CREATING WELL DESIGNED AND INCLUSIVE PLACES
Respondent: Mr David Barton [2683]

Summary:
OK but integrate effective TA with underground discreet car parking that is free to encourage visitation and net expenditure.

Full text:
Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.

OK but integrate effective TA with underground discreet car parking that is free to encourage visitation and net expenditure.

Change suggested by respondent:
-

Sound: Not specified
Attachments: None

5881 Object

Document Element: PGD1 - CREATING WELL DESIGNED AND INCLUSIVE PLACES
Respondent: HBF (Mr Mark Harris) [538]

Summary:
This policy in part duplicates the previous policy SP4 and a number of other policies in the plan; it is not considered necessary. This duplication causes confusion and extra work for those submitting planning applications.

Full text:
This policy in part duplicates the previous policy SP4 and a number of other policies in the plan; it is not considered necessary. This duplication causes confusion and extra work for those submitting planning applications.

Change suggested by respondent:
Delete the policy.

Sound: Yes
Attachments: None

6127 Object

Document Element: PGD1 - CREATING WELL DESIGNED AND INCLUSIVE PLACES

Respondent: Ms Lucie Taylor [2506]

Summary:

While Policy SP4 affirms development should follow Placemaking principles and Policy PGD1 promotes well-designed, inclusive spaces, SF&G believe these need strengthening. Specifically by, promoting active lifestyles requires more detailed guidance on creating safe, accessible environments. We need to see encouragement for outdoor socialising, growing, and eating. Smaller, community-owned green spaces, suitable for food growing and involving local businesses, can effectively promote health and social cohesion. Such multi-functional, resilient green spaces support biodiversity, flood mitigation, and climate adaptation, offering diverse opportunities for communities to interact rather than just through active travel and play.

Full text:

We are pleased to see Policy SP4 of the LDP states development will be required to follow Placemaking principles. This intention is followed through successfully in Policy PGD1 – Creating well designed and inclusive spaces. Yet we do not feel 'providing high quality multi-functional green open spaces which can provide a choice and range of activities..' goes far enough to promote the range of options available to promote well designed and inclusive spaces. We feel that the promotion of active and healthy lifestyles needs some reference at this juncture as to how this might be achieved. The need to create 'safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for active travel, and promote sustainable transport choice's' needs more robust wording to back it up. The reference in the explanatory text to walking cycling and safe play needs to be enhanced to discuss opportunities for incoming to communities to gather outdoors, to socialise, to grow, to eat and to plan their healthy lifestyles together. Maximising opportunities of walking, cycling and play to reduce the causes of ill health, and reducing health inequalities is something we as planners, have been trying to do for generations. We need to go further. More explanation of what a healthy environment looks like would be appreciated. We must design spaces with more dynamism, with a variety spaces and opportunities that communities can gain ownership of.
Where housing need is significant and indeed where viability of site delivery is a factor, smaller, more effective spaces, can be delivered at little cost and with the opportunity for community 'ownership' from the outset. Blank canvass, small areas for growing of food, commensurate to the size of development can achieve huge amounts in terms of promoting active and healthy lifestyles. Where there is a mix of uses, local businesses can become involved in the spaces through sponsorship, donations, gaining extra customers and receiving food to cook or sell. This type of place making can deliver true 'green infrastructure'. They are indeed - high quality multi-functional green spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.

Change suggested by respondent:

refer to the need for communities to interact and socialise outdoors and ways this may be achieved. A small shelter next to a communal growing area could provide this at little expense.

Sound: No

Attachments: None

6596 Comment

Document Element: PGD1 - CREATING WELL DESIGNED AND INCLUSIVE PLACES

Respondent: Mr David Barton [2683]

Summary:

Design Codes based on Traditional Vernacular Architecture should be utilised in preference to Design Guides.

Full text:

Context:
This consultation feedback submission has been produced by Mr. David Richard Barton, also known as Community Campaigner David Barton who is promoting both the existing Built Historic Environment and Traditional Vernacular Architecture (TVA)/ Traditional Architecture (TA) as a key feature across UK and Ireland-wide Local Authorities and associated Planning Departments at all tiers of Local, Regional and Central Government.
This universal consultation therefore acts as an official Representation at all and any stage of official area UK Planning Consultations- Preliminary Scoping Documents, Named Stages of the Local Plan, Conservation Area Appraisals and Supplementary Planning Documents (SPDs), primarily regarding Design Codes.
Representations are being made by Mr. Barton as part of his ongoing work to champion the key stakeholders at various key areas old and new with a view to supporting their economic growth through the merits of High-Quality style Conservation with the hope of encouraging wider constructive and restorative support through positive and constructive working.
It is submitted that TVA should play a key part in any and all policy moving forwards on the grounds of conferring practical benefits be these periodic maintenance, their perceived support from the public, their invaluable contribution to achieving Climate Crisis Targets set local, nationally and internationally alongside their overall cost-effectiveness to key stakeholders alike in terms of Planning and sourcing of raw materials.
*One primary document that should be considered with significance especially alongside my own representation is a

written academic account of the actual practicalities associated with Traditional Architecture from a leading expert in their field.i.) Not only does this in-depth analysis provide an in-depth take on the widely assorted merits of this type of Architecture but it fully corroborates my case made across all sections typically found in one of the consultations highlighted above.
Furthermore, my representations to date and contained herein this document are duly supported by the Founder and Director of The Institute for Traditional Architectureii.) who has identified and recognised my own contribution(s) to communities up and down the Sefton Borough. This is an internationally acclaimed organisation which periodically works with other leading agencies and organisations to bring about effective positive change.
Outlined throughout Submission are responses to existing Consultations which set out why I consider amendments to existing Planning Policy documents are necessary to ensure the best possible outcomes.
References to supporting documents are contained in the indented blue numbering.
This Submission has been prepared for UK and Ireland-wide Local Authorities in the hope that it may serve as an umbrella representation by Mr. Barton. This does not prejudice his ability to also comment on live stages of any one Consultation, merely providing the ability to be put in touch directly with any one Local Authority in receipt of this Representation with the prospect of also taking part in any version(s) of Consultations begin ran by said Local Authorities. If there are future consultations, especially regarding Design Codes and SPDs relating to this across both designated and non-designated heritage assets then it is hoped that these are duly provided to Community Campaigner David Barton.
Mr. Barton has cited material references and sources from his previous Representation to the Bootle Area Action Plan Consultation (2021-2026) that align with his existing and ongoing points which he would like to raise in parallel with other Local Authorities. Where a more detailed discussion with leading sources, such as Architects and Academics may prove conducive with these Councils then Mr. Barton would be delighted to discuss this further.
Community Campaigner David Barton:
Community Campaigner David Barton is a Heritage Campaigner of over 11 years' experience who has championed and led a number of successful campaigns to promote TVA in modern-day life. His dual mandate is to provide effective (alternative) use of historical buildings encompassing a full restoration alongside achieving the mainstream construction of new classical architecture on numerous economic, environmental and ecological grounds that align with existing policy set out by Central Government covering the UK and increasingly elsewhere across the world.
Having worked with a wide array of residents, businesses and organisations in that time, which has included the full restoration of the Victorian Verandahs on Lord Street, Southport in tandem with the respective key stakeholders and other property owners to prevent demolition of Old Builds across Sefton, Mr. Barton is now hoping to make the process of utilising the built environment to its fullest potential a far simpler one that will enable Bootle to fully reach its maximum potential as a historic town.
SECTION 1: Design Codes:-
1. Design Codes based on TVA should be utilised in preference to Design Guides
2. LAs should establish recurring partnerships with key Consultation Bodies, such as Create Streets and The King's Foundation, etc who specialise in getting through to a huge swathe of grassroots members of the public with tried and tested previous experience in Local Plans, such as Lichfield, etc.
3. Non-demolition of historic buildings prior to the 1950s must be made policy or adhered to as part of LCC's commitment to combatting the Climate Crisis through sequestering carbon in its Old Builds.
4. LAs should adopt a Local List of Valued Buildings (Non-designated Heritage Assets), which have been a Government requirement since the policy introduction through the NPPF in 2012. Historic England produced a guide to help Councils in May 2012. Bristol produced an exemplar list in 2015, which is well worth reviewing.
5. Existing Action Plan if present for Designated and Non-designated Heritage Assets needs identifying and/ or establishing (I may support this if invited).
6. Option for people to provide feedback even if out of time for additional documents, such as SPDs or at the discretion of Councils where feedback may be particularly assistive or lead to additional academic and architect guidance. Option for public publishing of feedback should be encouraged with the consultee's consent to encourage wider consultation uptake moving forwards.
7. Era-style Buildings, especially rows of Georgian, Victorian and Edwardian architecture must be faithfully restored, retained and recreated to complement surrounding historic streets that may or may not be classed in official Conservation Areas preventing harsh contrast with newer built housing estates from the 1950s onwards.
8. Where demolition is proposed for 1950s style housing onwards- any new construction must be in the historic building style and local materials to ensure high carbon capacity, quality aesthetic and true blending of the interconnected conurbations of any one area, place or location.
9. Concerted efforts to identify and locate core suppliers for raw materials and specific heritage skills should encourage new uptake of these limited artisan craft skills by new contractors locally based to support the local economy, provide employment, and reduce the cost of product and service in the long-term.
10. Volunteer labouring assemblies should be fully encouraged and supported identifying key individual an group skillsets that can be utilised to protect historic buildings or areas at risk with a view to supporting the construction of new authentic style housing (as and where appropriate) and the reconstruction of demolished prized old buildings beloved by the community, such as community pubs, libraries and community centres.
11. Simplified streamlined Planning Process for key stakeholders either working to authentically restore buildings and/ or build new ones, such as observed with many civic buildings in Budapest Hungary and the Federal University Buildings in the US.
12. Where there have been evolving building styles over years, eg. Combination of one or more: Georgian, Edwardian and Victorian, the style that best promotes the area, ie. One that has the majority era structures left or capacity size requirements as examples should be utilised by house builders, especially where a streetscape may have been

annihilated during the World Wars.
SECTION 2: Designated & Non-Designated Heritage Assets:
1. Enhancement of Historic Areas to remove modern street furniture with the integration of classical style timepieces should be encouraged and pursued wherever possible with clear preferred guides set out for each part of the City.
2. Enhancement of Setting with funding grants and financial incentives from all tiers of Government for Private Investors especially those contributing actively towards achieving Net Zero through Embodied Energy/ Carbon Capacity rich measures, i.e. Retention of Old Builds.
3. Archive Pooling of invaluable source material, such as Historic Photographs, Oil Paintings, such as “Memory Lane” featured on InYourArea Magazine to enrich existing material archives.
4. New officialising of Non-Designated Heritage Assets must be actively supported even if informed by the (wider) community thereby providing some possibility of removing these from risk of demolition.
5. Incentives must be provided to those dependable sincere third party investors that take on, maintain and protect said sites against their annihilation from the streetscape with rescue-packages actively promoted and supported once again with a trusted Directory creating goodwill amongst the local community.
6. Opportunity to meet or correspond on Zoom Conference Call regarding key areas, buildings and places at risk where key stakeholders, such as property owners may be better placed to engage in positive and constructive discussion through third parties, such as myself and a trusted panel of experts in their fields and sectors who could enable these people and organisations to maximise their civic heritage, whilst proactively striving to protect more historic buildings from decline and/ or demolition where a strategy package for raising the revenue to do this could be arranged and facilitated.
7. Defining Character Areas- zoning symmetrical parallel construction recommended where distinctive individualised properties remain as checked against authentic archive blueprints. This will ensure high-quality housing for everyone reducing the societal divides between misperceived “good areas” where affluent people reside in historical style properties and less advantaged reside in contemporary ones.
8. Industry should be conserved at former industrial complexes, such as Economic Docks with equivalent sites offering modern-day uses, alongside traditional uses such as export and import of raw materials at places such as Docks and Port encompassing: ICT sector, Green Research & Development, etc.
9. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of long-beloved buildings, especially those with demonstrable evidence of Holy Worship.
10. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of landmark buildings, especially those with key links to an area’s founding or history locally.
11. All Powers to monitor, collaborate with existing and/ or new property owners to conserve these buildings should become mandatory with appointed Community Champions for Civic Heritage that area direct link between Local Authorities and said wider key stakeholders to prevent demolition of structures that may be at risk of destruction from vandalism, urban exploration and demolition.
12. Reconstruction Programme harnessing existing limited crafts people’s skillsets to be used as a fundraising vehicle to bring back buildings that may have been demolished to dissuade future demolition as a choice by property owners and by means of expanding these otherwise lost skillsets that are at live risk of becoming extinct from the UK.
13. Checklist of buildings at high risk must be expanded beyond the existing groups and organisations that are saturated with high caseloads, such as SAVE Britain’s Heritage, etc so that dialogue channels can be created and fostered between Community Champions for Civic Heritage.
14. Bespoke-tailored funding packages for Properties at Risk of decline or demolition should be integrated with Local, Regional and Central Government-funding as a means of regional economic output through the return on investment that may support other key grant funding capital infrastructure projects, such as transportation and drainage improvements.
SECTION 3: Conservation Areas:-
1. Alterations for Listed Building Consent must be simplified with additional streamlined testing methodologies, such as proof of legitimate third party support, such as correspondence chains between applicant and Groups, such as The Victorian Society that can assist LAs complete workload much sooner allowing more attention for challenging cases, such as Non-Designated Heritage Assets at live or upcoming risk of demolition by Housebuilders, etc.
2. Highways & Street Furniture should be duly supported across the whole of an area to enhance its historic appeal to the commercial community as much to its indigenous community; as this is supported greatly in equivalent Public Realm Strategy SPDs- where any and all guidance and support must and should be provided, with key at risk projects being an exceptional anecdote that may be cited in future documents or versions of this and other consultations to stimulate economic construction and restoration across other designated Conservation Areas, etc or otherwise.
3. Provide incentives for the return of lost adornments and decorative features, such as roof fixtures like Chimney Stacks once again with an approved contractor directory to make Old Builds practical to own, live and work in the 2020s onwards. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.
4. Permissions for authentic replica and more durable materials, such as reproduction sash windows must be supported to prevent exorbitant high costs through procuring these, limited longevity and economic climates being unstable. This must be assessed on a case by case basis.
5. No more deliberate manipulation and selective misinterpretation of using contemporary modern designs using old-style fabric raw materials, such as stone cladding for new housing where the design and shape clearly undermine the concept of blending within or around a Conservation Area.
6. Compendium of approved and recognised TVA Architects based across the UK with a view to supporting the training in time of more Northern counterparts to reduce cost associated with travel expenses, etc. This will actively reduce the level of demolition applications countering the purpose of this SPD and other live Policy. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see

modern-day use of decorative features must be provided by the Local Council.
7. New Conservation Areas should be established covering areas of surviving built historic environment to positively reverse fascia changes to more modern ones.
8. Blue Plaques should be fully supported across as many different Conurbations, especially if Applicants reach out for endorsements.
9. Discretionary Rate Relief should be provided to those proactively support LAs with conserving their respective Conservation Areas through their own resources, skillsets and time as an incentive to others to work alongside the Council positively and constructively.
10. Where long-lost prized buildings are reconstructed whether based in a Conservation Area or not this should confer discretionary financial support, e.g. Rate Relief for the length of time taken to produce this outcome acknowledging the embodied carbon now contributing positively towards the LA's Climate Change Action Plan Targets.
11. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with collaborate fundraising models utilised from key stakeholders, such as property owners, undisclosed third party investors, Residents' Groups, etc.
12. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with authentic identical reproductions permitted where all options to secure finance have been fully exhausted and/or the existing streetscape is at imminent risk of receiving contemporary replacement street furniture on health and safety grounds, eg. Lap Posts.
SECTION 4: Climate Change:-
1. Pleased to note that LAs broadly acknowledge and grasp this concept therefore the aim should be to increase the net number of carbon-rich Old Builds long-term through support packages that will combat the Climate Crisis, provide economic benefit and improve Conservation in a pioneering fashion that may draw wider funding opportunities for the area.
2. Retrofit Ventilation is a key point that should warrant future new construction utilising higher ceilings through the reconstruction of Old Builds outfitted for the modern day with retrofitted energy supplies, etc that will also serve to break down societal dives regarding perceived good and bad areas where streetscapes are harmonious yet distinctly unique in beauty like any one Conservation Area.
3. Embodied energy and embodied carbon- must remain a central priority and so influence new construction to readopt TVA principles as this will be pivotal towards the area's future green credentials as outlined in many existing auxiliary planning documents approved presently with Carbon Studies taken of existing architecture, notably buildings saved from demolition.
4. A brick by brick case study of as many buildings as possible may warrant invitation of national and international academic institutions to undertake a regional or national Carbon Study further justifying the retention of prized Old Builds elsewhere across the area, region and the UK.
5. Sustainable Materials- an approved contractor directory that could readily advise and source the necessary raw materials with realistically reduced costs substantially again deterring potential demolition-driven applicants from consuming workload time of the Planning Department. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of sustainable materials must be provided by the Local Council.
6. Biodiversity- maximise greenery along all arterial roads ad commuter routes with dense tree planting and the introduction of hedgerows and wherever possible financial incentives to get more private property owners on side.
7. Flooding Defences- existing and prospective hotspot areas should be clearly identified for emergency grant funding whereby Local Authorities, especially across a region may agree with the respective Government Department to distribute emergency flooding to prevent costly consequential recurrent repairs.
8. Transportation using arterial roads and commuter routes (Motorways and Railways) should prioritise linking each end of a Local Government sphere with the surrounding Local Government spheres, such as Southport at the very northern tip of Merseyside where transportation links are much weaker with Lancashire in the north and east than with the rest of Merseyside to the south.
9. Coastlines should be reclassified as SSSIs, especially where the economic potential is not being fully realised, such as Coastal Towns with underused Beaches, such as Southport in Sefton as one example for other LAs.
10. Financial Incentives for the demolition of Carbon-poor Glass Towers and contemporary construction should be utilised to restore the skylines across any one area whilst providing better mathematical application of the space for residential and commercial use, such as larger tenement buildings or the original streetscape reinstated yet designated specifically for housing where there may be a deficit.
SECTION 5: Historic Buildings:-
1. Create a Designated AND a Non-Designated Heritage Asset List, such as AHV whereby existing buildings and those that may yet return can be logged and recorded to combat the Climate Crisis whilst making heritage work for LAs in modern day with attractive locations timeless for everyone to appreciate enhancing the investor appeal, all-round interest and acknowledging the industrial pioneering legacy of the City.
2. Clearance of vegetation along the Railway Lines alongside other equivalent parts of the Line to eradicate the perceived neglected aesthetic.
3. Exception Areas, such as those at risk or recently restored have the real potential for wider grant funding for ambitious projects out of the realm necessarily of undisclosed third party investors supporting Property Owners, therefore all and any support in reaching these person(s) will greatly contribute to all possible tangible success in the interim period.
4. Providing key guidance, such as agreed in-keeping historic street furniture, such as Cast Iron Lamp Posts, Bins, Planters approved upon inspection of historic photographs, agreed installation and where appropriate maintenance by the LA will ensure the iterative success of this transferring to other Conservation Areas, etc.
5. Scheme to rebuild and reconstruct long-lost buildings, prioritising vacant sites that could adapt some mixed use with

residential accommodation and commercial application thereby supporting Climate Action, creating employment and recordable success through placing of necessary economic drivers, such as offices for Technology Sector if original use cannot be sourced in sufficient time simultaneously meeting housing targets.
6. Archive Blueprints for historic conurbations that have suffered architecturally over time through building conversions, demolitions, etc should be provided to key stakeholders, if necessary with a printing charge available for official spiral hard copy version to view detailed historic plans covering layouts, etc.
7. Those people and organisations that have either/ both maintained their properties well over the years or may wish to provide additional support to others, such as restorative support, archive blueprint guidance, etc should be eligible for discretionary reductions by the Council across various property taxes where they may be suffering hardship or through personal circumstances.
8. “Newer” style housing with true authentic rhythm, such as Suburban style faux Tudor fascia frontages with red clay tile pitched roofs and terracotta design windows (tile hung walls) are a good compromise whereupon finance and scheduling may otherwise adversely impact on housing settlements.
9. Fascia Frontage details should be reinstated whether in a Conservation Area or not, especially where approval has been granted to rebuild an entire house using breeze block to produce a stereotypical black, white and grey dwelling out of place.
10. LAs should work closely with Foundries to procure raw materials and building services in the event of harnessing their own Contractor Firm(s) in-house that could work cross-authority to make net savings whilst ensuring particular new housing neighbourhoods conform to an appropriate style.
11. Modern “Carbuncle” extensions should not be permitted at any one area- instead an authentic style addition may be used to retain blending.
12. Discretionary financial support packages to assist House Builders choosing the traditional vernacular route should be considered and utilised where it can be proven that this third party will restore the historic streetscape yet making it applicable or modern day requirements- residential or commercial. This may be especially so where they are able to help others prevent the demolition of a prized Old Build built before the 1950s.
SECTION 6: Traditional Vernacular Architecture:-
1. Provide a directory of approved and trusted Conservation Specialist Contractors- this will be key for repairs and maintenance reducing costs for all parties, expediting the physical process of regeneration and smoothen planning work schedules so that finer detail may be considered on priority cases or those that may be at risk of consequential repair, such as Places of Worship and detached Buildings with flat roofs, etc at higher risk of damage than customary dwellings.
2. These same people should be readily contactable for new construction
3. Encourage smart building methods and use of TVA as meticulously explained in this SPD outlining “Breathing” Solid Wall Construction using older style materials thereby reducing maintenance cost which combined with the approved contractor directory will further drive down costs, time and effort for everyone.
4. Alterations- must introduce a simplified listed building consent form and application process that is streamlined encouraging better maintenance of Old Builds and reducing the rising propensity of builders to allow buildings to deteriorate, such as the Historic Pub that had to be rebuilt in Kilburn, London post 2015.
5. Provide specialist Heritage Arts & Craft Skills Programmes that anyone can learn and use so that these high cost tasks can eventually stabilise in price making them more affordable and available to those that don’t have the time to do this themselves or may be risk averse even.
6. Extensions- there must be a proactive emphasis on in-keeping structural fabric to prevent future errors, such as the Municipal Building depicted in the SPD being replicated again thereby harming the Conservation value.
7. New Housing Estates should adopt historical archival blueprints, ie. A Georgian, Victorian or Edwardian layout with the likeliest period architecture utilised where this area remained greenbelt until the 1950s.
8. Area Expansion of housing must revert to traditional timeless designs that confer many practical advantages over modern styles that are harder to maintain are timeless with regard to dating and ensure a more evenly distributed community atmosphere in the long-term future.
9. Infrastructure should be appropriately considered for existing and new areas so that no one area is at risk of becoming congested through traffic for a particular commodity, such as Schools, Doctor Practice, Dental Practice, etc.
10. Site Layouts should complement the historic layout with a view to Post 1950s contemporary Architecture out of place being one day demolished to reinstate Long-lost beloved buildings from before the World Wars that could blossom economically today.
11. Building Form shouldn’t permit for dated modern structures that delineate and essentially divide communities between the old and new parts of any one location.
12. Façade Design mustn’t be compromised for contemporary architecture, especially in view of coveted Heritage Status for any one area being at risk of being lost if said contemporary architecture is pursued.
SECTION 7: Making an application:-
1. Identify recurring applicants that are harming civic heritage, be this across Conservation Areas, Non-designated heritage assets or elsewhere with experience of demolition to date- this should be considered before granting permission to apply or acquire planning approval.
2. Enforcement Penalties for key stakeholders that purposely allow their properties to fall into decline and hoped eventual demolition through this tactic, which is more prevalent since 2020.
3. Create an Action Plan to deter persons or organisations from pursuing demolition, such as financial incentives, sincere investor network directory set by Central Government to offload for profit and enforced Design Codes that cannot be manipulated through semantics like Design Guides in isolation as has happened elsewhere. This must be kept for emergency instances where there is an expected threat of decline or demolition.
4. Agreed that temporary alteration of heritage sites, such as stairs or ramps for wheelchairs should be utilised to prevent

deleterious loss of historic surroundings and features alike.
5. Full Pre-Consultation publicised and utilised to ensure appropriate Design Codes for new housing alongside positioning and layout in case volunteer assemblies may assist property owners with restoration of historic buildings.
6. Brick by brick Analysis undertaken of projects set for Traditional reconstruction so that these statistics may provide both the Council with evidence for green grant funding support for other key infrastructure projects, such as Transportation and
Drainage Defences and property owners may incur a discretionary reduction in associated reconstruction costs of heritage buildings and vistas.
7. Ability to lock feedback in for Consultation automatically unless the council can alert interested consultees in taking part again whether they are locally, regionally or nationally based.
8. Special partnerships with Property Owners of historic buildings at risk of decline/ demolition to discreetly support them with the option to publicise this accordingly to reach out to others in the same position to secure alternative use for these structures as opposed to demolition.
9. Proactive effort to stop Breaking and Entering style of “Urban Explorers” who are coincidentally apparent whenever demolition is scheduled for buildings especially since 2020.
10. LAs to proactively work closely alongside Community Champions and other leading Heritage Groups, such as English Heritage giving these organisations a voice on the frontlines, especially where so many buildings are presently being overlooked for additional guidance and/ or support due to cost and time restraints facing these same groups and organisations (including the LA).
SECTION 8: MISCELLAENOUS:-
1. Provide all possible support for the reconstruction of Old Builds as is happening elsewhere across Europe, especially Budapest, Hungary, North America, etc to significantly increase Embodied Energy/ Carbon storage.
2. Establish a Plan to adopt Unadopted Roads or supply key services, such as carriageway resurfacing as disabled access and entry/ exit of Emergency Vehicles is presently a cause for concern.
3. Provide Pre-Approval and agreement of specialist Conservation Area style Historic Street Furniture, such as Cast Iron Lamp Posts, Bins and Planters for this prime Conservation Area including installation, maintenance costs (where appropriate).
4. Provide full access to the Archive Resources (at no/minimal cost) as an invaluable incentive for existing and parallel undisclosed third Party Investors. Discretionary waivers may be appropriate for those third parties proactively working to prevent decline and demolition of historic buildings.
5. Car Parking on and off street should be supported to ensure freedom of choice for everyone, accessibility and connectedness.
6. Car Parking abodes should be tastefully designed like modern-day stables for vehicles that are in-keeping with the built historic environment.
7. Provide publicly published names of consultees willing to work alongside the Local authority and other key stakeholders, such as property owners and undisclosed third party investors, etc.
8. Provide select tours for prospective investors and housebuilders of existing traditional architecture where Design Codes of this identical style would complement both old and new architecture bending the area better more cohesively, eg. the form and layout of Oxford City Centre which has changed minimally structurally since the 1800s.
9. Provide a focused effort on utilising people’s skillsets on a meritocratic basis, ie. Procure specialists and volunteers that could work together on key emergency projects, such as Historic buildings at risk without layered bureaucracy on achieving positive outcomes, such as Community Assets where deadlines can be thwarted by separate third parties.
10. Create a Top Ten Historic Buildings at Risk Register where appropriate conditions, such as security against Urban Exploration, etc can be utilised safeguarding these structures, providing the respective property owners peace of mind whilst actual scope for revitalising these for solid economic gain.
11. Infrastructure assessments should be fully outlined, such as Air Quality risk from new construction at presently congested areas, hence the case for Traditional Architecture that will confer longevity benefits in the long-term with as much free car parking as possible.
12. Free Car Parking may be monitored through expected proof of purchase when visiting, eg. minimal £1.00 at a shop encouraging partnerships between private businesses and LAs.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation - https://valeofglamorgan.oc2.uk/a/33d

6624 Comment

Document Element: PGD1 - CREATING WELL DESIGNED AND INCLUSIVE PLACES

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces should not immediately abut residential buildings.

South Wales Police ask that all new developments are built to Secured by Design standards and that they work with The Vale of Glamorgan planning Department at the pre planning stage to ensure safe spaces.
Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document).
It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial) Guide.
South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.
We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.
Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.
Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the

opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where "qualifying activities" take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:

Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states 'The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.'
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery. Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)
identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy

2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.
South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out

Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning

stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out

crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public

transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

6774 Object

Document Element: PGD1 - CREATING WELL DESIGNED AND INCLUSIVE PLACES

Respondent: Persimmon Homes (East Wales) [1068]

Agent: Boyer Planning

Summary:

Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a

more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and

incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes

cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to

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

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

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

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

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

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

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

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

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

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

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

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

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

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

From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in

reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.

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

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

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

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

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

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

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

Policy SP2 – Settlement Hierarchy

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

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

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

Policy SSC1 – Development within Settlement Boundaries

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

Policy SP4 – Placemaking

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

The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of

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

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

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

Policy PGD1 – Creating Well Designed and Inclusive Places

Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.

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

Policy PGD2 – Residential Development Densities

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

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

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

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

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

Policy SP5 – Creating Healthy & Inclusive Places and Spaces

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

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

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

RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future

residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
Loss of Allocated Employment Land
Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
Policy HG3 – Housing Led Redevelopment Opportunity
Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.

Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
Policy SP7 – Affordable Housing Provision
In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
Policy SP8 – Affordable Housing Requirements
Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.
Policy SP10 – Sustainable Transport
Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.
In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
Policy TR1 – Transport Proposals
Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most

notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.
In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.
Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.
Policy SP13 – Community Infrastructure and Planning Obligations
Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
Policy CI1 – Open Space Provision
Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.
The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.
Productive and Enterprising Places
Policy CC1 – Residential Operational Net Zero Carbon Development
Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.
Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.
The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.
Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.
Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.
Distinctive and Natural Places
Policy SP19 – Green Infrastructure

In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.
The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.
Policy SP20 – Biodiversity and Ecosystem Resilience
In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.
Policy DNP1 – Special Landscape Areas
Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.
Policy DNP2 – Green Wedges
Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.
Policy DNP8 – Severn Estuary Recreational Pressure
Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
Conclusion
Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes' most pertinent comments on the consultation document are summarised below:
• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained

physically and environmentally.
• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

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

Sound: Not specified

Attachments:

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

6907 Object

Document Element: PGD1 - CREATING WELL DESIGNED AND INCLUSIVE PLACES
Respondent: Barratt Redrow Homes [2669]
Agent: Boyer Planning

Summary:

Barratt Redrow question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.

Full text:

1. INTRODUCTION
1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.
1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:
• Section 3 – The Vale of Glamorgan Key Characteristics;
• Section 4 – RLDP Key Themes, Vision, and Objectives;
• Section 5 – Sustainable Growth Strategy; and
• Section 6 – Policy Framework.

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

1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS
Settlement Pattern
2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.
2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Need
2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
3. RLDP KEY THEMES, VISION, AND OBJECTIVES
3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.
Key Themes
3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY
Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary

settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

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

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

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

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

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

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

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

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

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

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

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

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

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

5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036) and therefore is made up of

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

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.
5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.
5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.
5.27 In summary, Barratt Redrow acknowledge the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
5.28 These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance and additional site allocations, such as Swn Y Coed, Wenvoe, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
5.29 Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.
5.30 Accordingly, despite Wenvoe being identified as a primary settlement, Policy SP2 notes that development in this

location will be limited to 'the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.' Similarly, it is noted that Policy SP2 does not consider Wenvoe to be an appropriate location for ''substantial additional growth''.
5.31 Barratt Redrow object to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified.
5.32 First of all, the Deposit Plan acknowledges that it performs a similar function to the Primary Settlements located within the Strategic Growth Area and it is described as one of the 'sustainable communities' in The Vale of Glamorgan Key Characteristics section, as noted previously in Section 3.
5.33 Likewise, the site benefits from excellent accessibility the local public transport network, active travel routes and local services. These characteristics fully accord with Welsh Government's strategic objectives and emphasise the fact that Swn Y Coed constitutes an appropriate location for future housing.
5.34 With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge''. Barratt Redrow do not consider this to be sufficient justification to discount the site from allocation as there would be limited impact on BMW agricultural land arising from the development of Swn Y Coed.

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available.
5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.
Policy SP4 - Placemaking
5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.
5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.
5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.
5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.
5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
Policy PGD1 – Creating Well Designed and Inclusive Places
5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate

understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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Unsustainable Location & Poor Connectivity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.

• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.
• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.
• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.
• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.
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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
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• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility

through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply
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• HG1 (8) St Athan - Clive Road, St Athan

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

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

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

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and

whether the plan is justified (Test 3).
• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4).Finally, the Council's own Viability Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.
• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.
• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:
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Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:
i. Space heating demand less than or equal to 40kWh/m2/year;
ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.
• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's

methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
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Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established 'defensible' limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a

similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be 'largely shielded from view by woodland blocks/strips'.
• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for 'infilling' the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.
• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
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Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
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Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.

• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
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MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
•
• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
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• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
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CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

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

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

Change suggested by respondent:

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

Sound: Not specified

Attachments:

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

7100 Object

Document Element: PGD1 - CREATING WELL DESIGNED AND INCLUSIVE PLACES

Respondent: Barratt Redrow Homes [2669]

Agent: Turley

Summary:

There is a degree of crossover and repetition between Policy PGD1 and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Full text:

Policy SP1 - Sustainable Growth Strategy
Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local

circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.
It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.
In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"
Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be concentrated is supported.

Policy SP2 - Settlement Hierarchy
The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable.
As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Policy SP4 - Placemaking
We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.
The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses... ' or to be developed at 'high densities... and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.
Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Policy PGDl - Creating Well Designed and Inclusive Places
There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is

important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).

Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision

The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy Cll - Open Space Provision
The wording of Policy Cll, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy Cll should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy Cll requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact

on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

Amend to be only one policy.

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

4583 Comment

Document Element: PGD2 – RESIDENTIAL DEVELOPMENT DENSITIES

Respondent: Mr David Barton [2683]

Summary:

Low density must be pursued with Traditional Architecture used to mitigate against otherwise harmful effects.

Full text:

Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.

Low density must be pursued with TA used to mitigate against otherwise harmful effects.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

4976 Object

Document Element: PGD2 – RESIDENTIAL DEVELOPMENT DENSITIES

Respondent: Emma Reed [2653]

Summary:

Further explanation is required to explain the role of settlements such as Rhoose and the density acceptable there. It is considered that the village exhibits spacious standards with bungalows and houses being the predominant housing type. A maximum of 30 dwelling per hectare after deductions is therefore considered a maximum for this area. In Barry Penarth etc 35 is appropriate due to its better facilities and infrastructure.

Full text:

Further explanation is required to explain the role of settlements such as Rhoose and the density acceptable there. It is considered that the village exhibits spacious standards with bungalows and houses being the predominant housing type. A maximum of 30 dwelling per hectare after deductions is therefore considered a maximum for this area. In Barry Penarth etc 35 is appropriate due to its better facilities and infrastructure.

Change suggested by respondent:

Rhoose should have a maximum of 30 units per hectare to enable any developments permitted to fit in with the essentially rural nature of the village.

Sound: No

Attachments: None

6013 Support

Document Element: PGD2 – RESIDENTIAL DEVELOPMENT DENSITIES
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:

The approach to residential development densities in Policy PGD2 is consistent with paragraph 3.51 of PPW. The Land to the East of Colwinston allocation measures approximately 0.84ha and is therefore able to provide the minimum density of 30 dwellings per net hectare set out in Policy PGD2. It is noted that the Candidate Site Submission for Land to the East of Colwinston (Site ID: 453) was for a gross site area of 5.24ha and therefore if the allocation were to be expanded, up to 157 dwellings could be delivered at the site during the RLDP period.

Full text:

The Land to the East of Colwinston allocation measures approximately 0.84ha and is therefore able to provide the minimum density of 30 dwellings per net hectare set out in Policy PGD2. It is noted that the Candidate Site Submission for Land to the East of Colwinston (Site ID: 453) was for a gross site area of 5.24ha and therefore if the allocation were to be expanded, up to 157 dwellings could be delivered at the site during the RLDP period.

The approach to residential development densities in Policy PGD2 is consistent with paragraph 3.51 of PPW which states that "Higher densities should be encouraged in urban centres and near major public transport nodes or interchanges, to generate a critical mass of people to support services such as public transport, local shops and schools."

As such, as drafted Policy PGD2 meets the three tests of soundness.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

6775 Comment

Document Element: PGD2 – RESIDENTIAL DEVELOPMENT DENSITIES
Respondent: Persimmon Homes (East Wales) [1068]
Agent: Boyer Planning

Summary:

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

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

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

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

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

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.

Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking

As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

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

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

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

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

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

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

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

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

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

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

In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.

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

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

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

Section 6: Policy Framework

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

Strategic and Spatial Choices (Placemaking)

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

This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in

the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority. Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence

base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.

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

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

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

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

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

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

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

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

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

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

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

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

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

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

Policy SP2 – Settlement Hierarchy
In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.
Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.
Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.
Policy SSC1 – Development within Settlement Boundaries
Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.
Policy SP4 – Placemaking
In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.
In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car.
Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.
The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.
Policy PGD1 – Creating Well Designed and Inclusive Places
Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.
On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary

Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.

Policy SP5 – Creating Healthy & Inclusive Places and Spaces

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

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

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

Table 4. Extract of Proposed Criteria for HIA Assessments

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

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

Active and Social Places

Policy SP6 – Housing Requirements

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

Policy HG1 – Housing Allocations

HG1 KS2 – Land to the North of Dinas Powys

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

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

Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within

landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
Loss of Allocated Employment Land
Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
Policy HG3 – Housing Led Redevelopment Opportunity
Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
Policy SP7 – Affordable Housing Provision
In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
Policy SP8 – Affordable Housing Requirements
Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.
Policy SP10 – Sustainable Transport
Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure

sustainable growth is not unduly constrained.
In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.
In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
Policy TR1 – Transport Proposals
Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.
In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.
Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.
Policy SP13 – Community Infrastructure and Planning Obligations
Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
Policy CI1 – Open Space Provision
Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.
The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.
Productive and Enterprising Places
Policy CC1 – Residential Operational Net Zero Carbon Development
Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.
Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.
The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst

reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.

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

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

Distinctive and Natural Places

Policy SP19 – Green Infrastructure

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

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

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

Policy SP20 – Biodiversity and Ecosystem Resilience

In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Policy DNP1 – Special Landscape Areas

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

Policy DNP2 – Green Wedges

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

Policy DNP8 – Severn Estuary Recreational Pressure

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

The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what

level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
Conclusion
Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes' most pertinent comments on the consultation document are summarised below:
• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

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

Sound: Not specified

Attachments:

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

6908 Comment

Document Element: PGD2 – RESIDENTIAL DEVELOPMENT DENSITIES

Respondent: Barratt Redrow Homes [2669]
Agent: Boyer Planning

Summary:

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

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

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

Full text:

1. INTRODUCTION
1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.
1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:
• Section 3 – The Vale of Glamorgan Key Characteristics;
• Section 4 – RLDP Key Themes, Vision, and Objectives;
• Section 5 – Sustainable Growth Strategy; and
• Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.
1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS
Settlement Pattern
2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.
2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Need
2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
3. RLDP KEY THEMES, VISION, AND OBJECTIVES

3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.
Key Themes
3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY
Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes

which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
5.10 For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
5.11 More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part

of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
5.12 Whilst Barratt Redrow appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range, having reviewed the Deposit Plan evidence base Barratt Redrow believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
5.13 In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
5.14 Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
5.15 In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
5.16 In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need. Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036) and therefore is made up of

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.
5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have

identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.
5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.
5.27 In summary, Barratt Redrow acknowledge the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
5.28 These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance and additional site allocations, such as Swn Y Coed, Wenvoe, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
5.29 Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.
5.30 Accordingly, despite Wenvoe being identified as a primary settlement, Policy SP2 notes that development in this location will be limited to 'the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.' Similarly, it is noted that Policy SP2 does not consider Wenvoe to be an appropriate location for ''substantial additional growth''.
5.31 Barratt Redrow object to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified.
5.32 First of all, the Deposit Plan acknowledges that it performs a similar function to the Primary Settlements located within the Strategic Growth Area and it is described as one of the 'sustainable communities' in The Vale of Glamorgan Key Characteristics section, as noted previously in Section 3.
5.33 Likewise, the site benefits from excellent accessibility the local public transport network, active travel routes and local services. These characteristics fully accord with Welsh Government's strategic objectives and emphasise the fact that Swn Y Coed constitutes an appropriate location for future housing.
5.34 With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge''. Barratt Redrow do not consider this to be sufficient justification to discount the site from allocation as there would be limited impact on BMW agricultural land arising from the development of Swn Y Coed.

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available.
5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.
Policy SP4 - Placemaking
5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.
5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.
5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.

5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.
5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
Policy PGD1 – Creating Well Designed and Inclusive Places
5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations

Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.
• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application,

and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.
• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.
• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.
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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
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• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply
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• HG1 (8) St Athan - Clive Road, St Athan

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

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its

redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all

potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).
• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4).Finally, the Council's own Viability Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.
• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has

been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.
• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:
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Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:
i. Space heating demand less than or equal to 40kWh/m2/year;
ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.
• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
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Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.

• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established ‘defensible’ limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be ‘largely shielded from view by woodland blocks/strips’.
• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for ‘infilling’ the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.
• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
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Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text

suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
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Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.
• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
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MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
•
• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
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Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
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CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the Council's vision for the VoG.
• 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
• 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
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6. CONCLUSION
• Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.
• Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swn Y Coed, are necessary to ensure the RLDP is able to effectively meet
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Barratt Redrow welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Barratt Redrow support the requirements for affordable housing in new development. In its current form the proposed policies SP7 and SP8 lack sufficient flexibility for site specific circumstances and physical constraints which may impact upon delivery. This inevitably creates uncertainty for a number of sites, where the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities.
• From a planning perspective it is also important to recognise the additional benefits the site (Candidate Site Ref No. 437) could provide in accommodating the increased housing need generated by the suggested 15% flexibility allowance within a highly sustainable location. The principles of which clearly align with the Council's aspirations and would

maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport

Change suggested by respondent:

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

Sound: Not specified

Attachments:

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

7101 Comment

Document Element: PGD2 – RESIDENTIAL DEVELOPMENT DENSITIES

Respondent: Barratt Redrow Homes [2669]

Agent: Turley

Summary:

It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations. This is relevant to Church Farm, St Athan.
The inclusion of caveats recognising that lower densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Full text:

Policy SP1 - Sustainable Growth Strategy
Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.
It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.
In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"
Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be concentrated is supported.

Policy SP2 - Settlement Hierarchy
The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable. As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Policy SP4 - Placemaking
We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.
The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses... ' or to be developed at 'high densities... and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.
Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Policy PGDl - Creating Well Designed and Inclusive Places
There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm

development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved

through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy CII - Open Space Provision
The wording of Policy CII, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy CII should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy CII requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7189 Support

Document Element: PGD2 – RESIDENTIAL DEVELOPMENT DENSITIES
Respondent: H Jones, L Sungur and P John [3741]
Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

The policy is considered to meet the 3 tests of soundness.
The approach of policy PGD2 is also supported through the proposed density of the site North of Westwinds business park, Fferm Goch in HG4 (4).

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis.
Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

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

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

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

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

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

SP1 – Sustainable Growth Strategy

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

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

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

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

Without targeted allocations outside of the SGA, as outlined in Policy SP1, the gap described above will continue to

widen, forcing more residents to leave the area and weakening community cohesion.

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the RLDP the supporting text of Policy SP2 states:
'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

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

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

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

PGD2 – Residential Development Densities

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

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

SP6 – Housing Requirement

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

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

SP7 – Affordable Housing Provision

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

Please see comments for Policy SP1 / Policy SP2 above regards concern over the proposed housing numbers and

supply of affordable homes against demand - this therefore brings the Deliverability of the plan in to question (Test of Soundness 3).

SP8 – Affordable Housing Requirements

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

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

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

HG4 – Rural affordable housing led sites

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

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

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

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

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

SP13 – Community infrastructure and planning obligations

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

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

CI1 – Open Space Provision

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

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

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

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

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

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

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

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

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

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

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

Change suggested by respondent:

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Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

5925 Object

Document Element: SP5 - CREATING HEALTHY AND INCLUSIVE PLACES AND SPACES

Respondent: HBF (Mr Mark Harris) [538]

Summary:

The HBF objects to the requirement to carry out a screening assessment relating to health impacts, as the plan has already considered the impact of the proposed developments on the health and well-being of communities through the strategic HRA and HIA and set out policies to address any concerns. Consequently, where a development is in line with policies in the local plan, a HIA should not be necessary for individual sites. Only where there is a departure from the plan should the Council consider requiring an HIA.

Further, if the developer complies with the other wording of the policy, then the development will have taken into account its impact on health, so why then carry out a screening assessment? The policy tests can be achieved without carrying out a screening assessment.

In terms of the requirement to complete a Healthy Placemaking Checklist, the policy refers to guidance in an SPG, which currently does not exist; this could lead to delays in the delivery of housing schemes. It also leads to uncertainty for developers who do not currently know what will be required. Placemaking is also required by other policies in the plan, and the health impacts of the plan have also been considered through the HIA process, so what additional information could such a document provide?

Full text:

The HBF objects to the requirement to carry out a screening assessment relating to health impacts, as the plan has already considered the impact of the proposed developments on the health and well-being of communities through the strategic HRA and HIA and set out policies to address any concerns. Consequently, where a development is in line with policies in the local plan, a HIA should not be necessary for individual sites. Only where there is a departure from the plan should the Council consider requiring an HIA.

Further, if the developer complies with the other wording of the policy, then the development will have taken into account its impact on health, so why then carry out a screening assessment? The policy tests can be achieved without carrying out a screening assessment.

In terms of the requirement to complete a Healthy Placemaking Checklist, the policy refers to guidance in an SPG, which currently does not exist; this could lead to delays in the delivery of housing schemes. It also leads to uncertainty for developers who do not currently know what will be required. Placemaking is also required by other policies in the plan, and the health impacts of the plan have also been considered through the HIA process, so what additional information could such a document provide?

Change suggested by respondent:

Remove the requirement to carry out a screening assessment.

If the screening requirement is retained, the threshold should be set higher, as this would be an overly onerous requirement for smaller sites below 100 units.

Sound: Yes

Attachments: None

6015 Object

Document Element: SP5 - CREATING HEALTHY AND INCLUSIVE PLACES AND SPACES
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:

For major residential developments, Policy SP5 requires that a “Healthy Placemaking Checklist” be undertaken and for significant residential developments, a rapid HIA is required. The need to ensure that development proposals are designed to facilitate accessible healthy environments is recognised. However, there is a need to be cautious in applying additional policy burdens like HIAs to sites proposed for allocation in the RLDP that could go beyond what has been tested in the Viability Assessments submitted during RLDP preparation, especially for smaller sites. Policy SP5 as drafted therefore risks not achieving the third test of soundness (Will the Plan deliver?)

Full text:

Policy SP5 states that “developers are required to undertake a screening assessment of their proposals at the pre-application stage to identify the potential health impacts of their development..”. For major residential developments between 10 and 99 dwellings, Policy SP5 requires that a “Healthy Placemaking Checklist” be undertaken and for significant residential developments of 100 dwellings or greater, the policy requires a rapid HIA be undertaken. The need to ensure that development proposals are designed to facilitate accessible healthy environments is recognised. However, there is a need to be cautious in applying additional policy burdens like HIAs to sites proposed for allocation in the RLDP that could go beyond what has been tested in the Viability Assessments submitted as part of the RLDP preparation, especially for smaller sites. Policy SP5 as drafted therefore risks not achieving the third test of soundness (Will the Plan deliver?)

Change suggested by respondent:

There is a need to be cautious in applying additional policy burdens like HIAs to sites proposed for allocation in the RLDP that could go beyond what has been tested in the Viability Assessments submitted as part of the RLDP preparation, especially for smaller sites.

Sound: No
Attachments: None

6086 Object

Document Element: SP5 - CREATING HEALTHY AND INCLUSIVE PLACES AND SPACES
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:

Policy SP5 requires that a “Healthy Placemaking Checklist” be undertaken for major residential developments and a "rapid HIA" be undertaken for significant residential developments. The need to ensure that development proposals are designed to facilitate accessible healthy environments is recognised. However, there is a need to be cautious in applying additional policy burdens like HIAs, especially for smaller sites. Policy SP5 as drafted therefore risks not achieving the third test of soundness (Will the Plan deliver?)

Full text:

Policy SP5 states that “developers are required to undertake a screening assessment of their proposals at the pre-application stage to identify the potential health impacts of their development..”. For major residential developments between 10 and 99 dwellings, Policy SP5 requires that a “Healthy Placemaking Checklist” be undertaken and for significant residential developments of 100 dwellings or greater, the policy requires a rapid HIA be undertaken. The need to ensure that development proposals are designed to facilitate accessible healthy environments is recognised. However, there is a need to be cautious in applying additional policy burdens like HIAs, especially for smaller sites. Policy SP5 as drafted therefore risks not achieving the third test of soundness (Will the Plan deliver?)

Change suggested by respondent:

Policy SP5 as drafted therefore risks not achieving the third test of soundness (Will the Plan deliver?)

Sound: No
Attachments: None

6131 Object

Document Element: SP5 - CREATING HEALTHY AND INCLUSIVE PLACES AND SPACES

Respondent: Ms Lucie Taylor [2506]

Summary:

We note that Policy SP5 mentions 'enabling access to a healthy food environment', which is positive. We suggest the explanatory text should clarify what this entails, referencing the SPG on healthy placemaking and outlining potential characteristics of such spaces. It should also discuss less capital-intensive ways to promote health and wellbeing, including food growing spaces, which could help address health inequalities. Additionally, incorporating affordable housing within allocated sites offers further opportunities to support a healthy, inclusive environment and mitigate health disparities.

Full text:

Social Farms & Gardens are pleased to see Policy SP5 creating healthy and inclusive places and spaces mentions 'enabling opportunities for access to a healthy food environment'. It is certainly a step in the right direction. Perhaps the explanatory text could refer to what is meant by this. Certainly reference needs to be made to the SPG on healthy place making. With the lack of clarity, a developer may move onto to considering other 'methods' of creating 'a healthy and inclusive place'. The explanatory text needs to make further reference to the possibilities such a space could look like and what it might entail. There is much discussion in the text about health and wellbeing services but there are also much less, capital intensive, things that can be provided. How could to a healthy food environment contribute to the wider determinants of health? These should be suggested and discussed at pre application stage. Reference to health inequalities is welcomed – perhaps more emphasis on the potential of food growing spaces could be brought in here. The need for affordable housing as part of 'allocated' sites presents a further opportunity to achieve this.

Change suggested by respondent:

reference to the different types of food growing spaces that can be provided to help create a healthy environment. less capital intensive ideas could be referred to our by referring the reader to the SPG on healthy placemaking.

Sound: No

Attachments: None

6625 Comment

Document Element: SP5 - CREATING HEALTHY AND INCLUSIVE PLACES AND SPACES

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.

Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.
We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.
Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of

enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.
Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.

South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where “qualifying activities” take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: “Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach” (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states ‘The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.’
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council’s standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes

for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery. Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)
identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.
South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.

• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and

integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from

within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment

Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

6716 Comment

Document Element: SP5 - CREATING HEALTHY AND INCLUSIVE PLACES AND SPACES

Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their
proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative
impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning
guidance (SPG) proposed. We are keen to ensure that these SPG's are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are
involved in the development of some of these. The content and application of the SPG's will be fundamental to the

effectiveness of several of the policies identified in the
deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community
amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient communities. The vision and strategic objectives currently contain no mention of ‘food’ or ‘farming’.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: “The Local Development Plan will support resilient and sustainable
local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part
of sustainable growth.”

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local
diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

“Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other
opportunities for local food production as part of multifunctional green infrastructure.”

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their
proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative
impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

6.54 We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live
full, productive and prosperous lives.'

6.60 We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid
HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to
ensure Developers submit a quality HIA and implement the conclusions.

6.61 Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

6.62 Wales Health Impact Assessment Support Unit has recently released guidance on HIA - see https://phwwhocc.co.uk/whiasu/ for more information and toolkits to ensure most up to date is in use.

6.63 Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the

community..'.

6.65 Suggestion to change wording from 'encouraged' to 'expected' for example:
Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement
for HIA will assist with this expectation.

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference “enhancements to leisure, sport and recreation spaces”. Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation. It is recommended that the Key Site schedules include minimum on-site provision standards and delivery
phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population
growth.

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail
centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer
supply chains. This limits opportunities for strengthening local food economies.
It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for ‘local affordable food’ outlined in SP5.

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach.”

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to
consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and
Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: “Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food
infrastructure within walking distance of new residential areas.” This addresses diet related health inequalities, encourages healthier communities and aligns with HIA
guidance.

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply
chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable
agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models.

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses - to include the following wording: “Rural diversification proposals that support agro-ecological farming, sustainable local food production,
community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations.”

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel
Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022
01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing
flooding and making use more comfortable during hot weather (such as shading from trees). We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

SP13 Community infrastructure and planning obligations:

We want to take this opportunity to highlight the challenges that population growth places on healthcare services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure. Please refer to the information provided as part of the background

evidence paper titled 'BP37
Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within
existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new
developments to take forward its strategic objectives.

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space Assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres. Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.”
There is no reference to the expectation that local communities are consulted in relation to the development of community facilities. We would like to see a
requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and
challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities
that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales’ push for local supply resilience, this is a major opportunity gap. Consider including the following wording:

“Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains.” This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or
urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: “Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing.”

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food
production, short supply chains or sustainable farming practices.
Consider including the following wording: “Development proposals should encourage short supply chains, low-carbon farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives.”

Change suggested by respondent:

We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live
full, productive and prosperous lives.'

Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of
community, health and social care and wellbeing services within the community..'.

Suggestion to change wording from 'encouraged' to 'expected' for example:
Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement
for HIA will assist with this expectation.

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

6717 Support

Document Element: SP5 - CREATING HEALTHY AND INCLUSIVE PLACES AND SPACES

Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid
HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to
ensure Developers submit a quality HIA and implement the conclusions.

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning
guidance (SPG) proposed. We are keen to ensure that these SPG's are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are
involved in the development of some of these. The content and application of the SPG's will be fundamental to the effectiveness of several of the policies identified in the
deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community
amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: "The Local Development Plan will support resilient and sustainable
local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part
of sustainable growth."

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local
diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

"Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other
opportunities for local food production as part of multifunctional green infrastructure."

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their
proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative
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growth.

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consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and
Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

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EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply
chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable
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Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses - to include the following wording: “Rural diversification proposals that support agro-ecological

farming, sustainable local food production,
community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations."

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel
Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022
01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing
flooding and making use more comfortable during hot weather (such as shading from trees). We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

SP13 Community infrastructure and planning obligations:

We want to take this opportunity to highlight the challenges that population growth places on healthcare
services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure. Please refer to the information provided as part of the background evidence paper titled 'BP37
Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within
existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new
developments to take forward its strategic objectives.

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space Assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres. Proposal to include the following information: "Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion."
There is no reference to the expectation that local communities are consulted in relation to the development of community facilities. We would like to see a
requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and
challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities
that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales' push for local supply resilience, this is a major opportunity gap. Consider including the following wording:

"Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains." This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or
urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: "Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing."

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food
production, short supply chains or sustainable farming practices.
Consider including the following wording: "Development proposals should encourage short supply chains, low-carbon farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives."

Change suggested by respondent:

-

Sound: Not specified

Attachments:
Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

6718 Object

Document Element: SP5 - CREATING HEALTHY AND INCLUSIVE PLACES AND SPACES

Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning guidance (SPG) proposed. We are keen to ensure that these SPG's are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are involved in the development of some of these. The content and application of the SPG's will be fundamental to the effectiveness of several of the policies identified in the deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: "The Local Development Plan will support resilient and sustainable local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part of sustainable growth."

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

"Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other opportunities for local food production as part of multifunctional green infrastructure."

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative

impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

6.54 We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live
full, productive and prosperous lives.'

6.60 We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid
HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to
ensure Developers submit a quality HIA and implement the conclusions.

6.61 Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

6.62 Wales Health Impact Assessment Support Unit has recently released guidance on HIA - see https://phwwhocc.co.uk/whiasu/ for more information and toolkits to ensure most up to date is in use.

6.63 Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the community..'.

6.65 Suggestion to change wording from 'encouraged' to 'expected' for example:
Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement
for HIA will assist with this expectation.

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference “enhancements to leisure, sport and recreation spaces”. Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation. It is recommended that the Key Site schedules include minimum on-site provision standards and delivery
phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population
growth.

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail
centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer
supply chains. This limits opportunities for strengthening local food economies.
It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for ‘local affordable food’ outlined in SP5.

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach.”

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to
consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and
Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: “Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food
infrastructure within walking distance of new residential areas.” This addresses diet related health inequalities, encourages healthier communities and aligns with HIA
guidance.

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply
chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable
agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models.

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses - to include the following wording: “Rural diversification proposals that support agro-ecological farming, sustainable local food production,
community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations.”

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel
Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022
01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing
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objectives."

Change suggested by respondent:

Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

6776 Object

Document Element: SP5 - CREATING HEALTHY AND INCLUSIVE PLACES AND SPACES
Respondent: Persimmon Homes (East Wales) [1068]
Agent: Boyer Planning

Summary:

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

Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.

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

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

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-

day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys

(HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.
Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations

across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.
In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority. Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.

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

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

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

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

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

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

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

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

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

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

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

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

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

Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process

(i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

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

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

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

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

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

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

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

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

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

Policy SP2 – Settlement Hierarchy

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

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

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

Policy SSC1 – Development within Settlement Boundaries

Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development

in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.

Policy SP4 – Placemaking

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

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

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

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

Policy PGD1 – Creating Well Designed and Inclusive Places

Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.

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

Policy PGD2 – Residential Development Densities

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

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

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

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

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

Policy SP5 – Creating Healthy & Inclusive Places and Spaces

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

The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will

establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations

HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
Loss of Allocated Employment Land
Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to

ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.

Policy HG3 – Housing Led Redevelopment Opportunity

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

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

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

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

Policy SP7 – Affordable Housing Provision

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

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

National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.

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

Policy SP8 – Affordable Housing Requirements

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

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

Policy SP10 – Sustainable Transport

Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.

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

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

proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.

Policy TR1 – Transport Proposals

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

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

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

Policy SP13 – Community Infrastructure and Planning Obligations

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

Policy CI1 – Open Space Provision

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

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

Productive and Enterprising Places

Policy CC1 – Residential Operational Net Zero Carbon Development

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

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

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

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

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

Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the

Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.

Distinctive and Natural Places

Policy SP19 – Green Infrastructure

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

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

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

Policy SP20 – Biodiversity and Ecosystem Resilience

In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Policy DNP1 – Special Landscape Areas

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

Policy DNP2 – Green Wedges

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

Policy DNP8 – Severn Estuary Recreational Pressure

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

The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.

From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.

Conclusion

Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes' most pertinent comments on the consultation document are summarised below:

• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail

and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

6909 Object

Document Element: SP5 - CREATING HEALTHY AND INCLUSIVE PLACES AND SPACES
Respondent: Barratt Redrow Homes [2669]
Agent: Boyer Planning

Summary:

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

Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.

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

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

Full text:

1. INTRODUCTION

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

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

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

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

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

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

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS

Settlement Pattern

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

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

2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

Housing Need

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

2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is

particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
3. RLDP KEY THEMES, VISION, AND OBJECTIVES
3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.
Key Themes
3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY

Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus

corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
5.10 For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is

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

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

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

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

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

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

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

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

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

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

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

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

5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This

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

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

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

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

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

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

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

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

Policy SP2 – Settlement Hierarchy

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

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

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

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

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

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

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

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

Policy SP4 - Placemaking

5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.
5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.
5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.
5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.
5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
Policy PGD1 – Creating Well Designed and Inclusive Places
5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

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

5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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Unsustainable Location & Poor Connectivity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 &

Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.
• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.
• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.
• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.
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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
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• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply

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• HG1 (8) St Athan - Clive Road, St Athan

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

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.

• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).
• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.
• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.
• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:
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Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:
i. Space heating demand less than or equal to 40kWh/m2/year;
ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.
• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
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Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and

based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

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

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

• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
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Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.
• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
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MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
•
• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact

upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
•
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
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CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the Council's vision for the VoG.
• 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
• 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
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6. CONCLUSION
• Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.
• Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swn Y Coed, are necessary to ensure the RLDP is able to effectively meet
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Barratt Redrow welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that

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

Change suggested by respondent:

-

Sound: Not specified

Attachments:

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

7083 Support

Document Element: SP5 - CREATING HEALTHY AND INCLUSIVE PLACES AND SPACES
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part

Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.

Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.

This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.

St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.

Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:

"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)

Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:

St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.

Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.

Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.

There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.

For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.

Policy SP2 – Settlement Hierarchy Position: Object

Barratt Redrow objects to Policy SP2 in its current form.

The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.

That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.

However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.

The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements

such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.

In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.

Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.

Policy SP6 – Housing Requirement Position: Object

Barratt Redrow objects to Policy SP6.

Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.

PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:

"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."

The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:

"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.

5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.

5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."

Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:

• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;

• Does not actively seek to address the area's ageing demographic;

• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;

• Does not seek to leverage any of the investment into the region through the CCR City Deal;

• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and

• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence

to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to “boom” or “recession” factors impacting on affordability are nevertheless able to “catch-up” later on – 80% of the gap at the age of 30 is “caught-up” by the age of 40. This finding supports the resumption of long-term household formation trends.

In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.

That concern is reinforced by the updated Welsh Government evidence published after the RLDP’s preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.

The updated 2022-based household projections point in the same direction. Welsh Government’s latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or “business as usual” response for the Vale. It points the other way.

This sits uncomfortably with the Council’s own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.

The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.

There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.

A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.

The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.

The Council’s own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a

1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable

settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.
Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part
Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of

affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being “informed” by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.

That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.

There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.

The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.

In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.

Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part

Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.

The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.

In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be “informed” by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council’s latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan’s blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.

8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.

The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;
• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.
The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before

the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.
Policy CI1 – Open Space Provision
Position: Support in principle / Object in part
Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.
The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.
There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.
Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a

standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission

Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need

for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment
We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

-

Sound: Not specified

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7084 Object

Document Element: SP5 - CREATING HEALTHY AND INCLUSIVE PLACES AND SPACES
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

Amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable

transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited

rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.

Policy SP6 – Housing Requirement Position: Object

Barratt Redrow objects to Policy SP6.

Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.

PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:

"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."

The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:

"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.

5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.

5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."

Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:

• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;

• Does not actively seek to address the area's ageing demographic;

• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;

• Does not seek to leverage any of the investment into the region through the CCR City Deal;

• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and

• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.

In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.

That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are

national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on

affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.
Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part
Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.
That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA

also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.
There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix. The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.
In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.
Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.
The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be “informed” by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council’s latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan’s blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.
8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part
Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.
The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan’s supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;
• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan’s effective provision.
The Deposit Plan’s own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted

strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed,

the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.

A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.

Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.

In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.

Policy CI1 – Open Space Provision

Position: Support in principle / Object in part

Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.

The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.

There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.

Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.

Policy SP4 – Placemaking

Position: Support in principle / Comment

Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.

That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.

Suggested wording amendment:

"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking

principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;

• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.

The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.

For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.

Candidate Site Register - Site ID 486

Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.

Stage 2 Candidate Site Assessment

The Council's Stage 2 Candidate Site Assessment states:

"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."

The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:

Impact upon Character and Setting of the St Nicholas Conservation Area

Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.

The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:

• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.

Countryside Impacts

The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.

The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.

Agricultural Land Quality

Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.

As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.

Appendix 2 – Summary of Assessment

We comment on the Council's Summary of Assessment as follows:

• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The

Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

Amend wording of SP5.

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

4585 Comment

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Mr David Barton [2683]

Summary:

Traditional Architecture will overcome challenges with housing quotas significantly if done authentically.

Full text:

Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.

TA will overcome challenges with housing quotas significantly if done authentically.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

4802 Comment

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Cwmpas [1874]
Agent: Cwmpas

Summary:

The addition of a specific reference to community led housing within Policies HG1, HG2, HG3 akin to that within HG5 would enable to the benefits and reach of community led housing to be expanded into mainstream housing policies and allocations and not only Exceptions Policy.

Our comments and observations are such as to suggest that references could be further extended within the Housing policies and still be in accordance with the framework of PPW Edition 12, key to the evolution of these policies.

Full text:

Cwmpas is positive in its response to the Deposit RLDP statements and welcomes the reference to community led housing as noted in:

Paragraph 6.121 – positive response though observation and request would be made to minor amendment to wording that after the words 'co-operative housing' the words 'and other forms of community led affordable housing' are inserted as this would accord with the context of PPW Edition 12 as noted.

Paragraph 6.141 – positive comment and response within the context of Exceptions Policy HG5. However, a request would be made that as well as reference to community land trusts that wording is supplemented with suggested words of 'and other forms and models of community led affordable housing.'

Furthermore, it is considered that the direct reference to community led affordable housing in the Deposit Plan document addresses and removes some of the potential barriers and challenges faced in the delivery of such forms of housing.

It is now clearly the case that PPW supports community-led housing as a form of affordable housing and that, in the view of Cwmpas, this is material to the considerations of Local Development Plan preparation and from which the Vale of Glamorgan Deposit Plan would benefit.

Going forward, however, Cwmpas, would consider that detailed planning policy development within the Deposit RLDP could make an overt and explicit community led affordable housing development reference and with specific community led housing policies in addition to those subsumed within more generic and general housing policies.

Firstly, the addition of a specific reference to community led housing within Policies HG1, HG2, HG3 akin to that within HG5 would enable to the benefits and reach of community led housing to be expanded into mainstream housing policies and allocations and not only Exceptions Policy.

Secondly, it would be considered as beneficial that the Deposit RLDP policies on community led housing development could include a clear definition of this type of affordable housing.

In summary, it is considered that the direct reference to community led housing in the Deposit Plan document as noted in Paragraphs 6.121 and 6.141 represent very positive inclusion and that it addresses and removes some of the potential barriers and challenges faced in the delivery of such forms of housing by drafting specific community led housing policies at the RLDP Deposit Plan stage. However, as outlined, our comments and observations are such as to suggest that references could be further extended within the Housing policies and still be in accordance with the framework of PPW Edition 12, key to the evolution of these policies.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/scd

4977 Object

Document Element: SP6 - HOUSING REQUIREMENT

Respondent: Emma Reed [2653]

Summary:

Rhoose a small settlement without major infrastructure is taking some 10 percent of the housing requirement with permissions outstanding at Rhoose Point and the new proposed development at Readers Way. This is a village which should not be taking such a high percentage of development when places like Llantwit Major Cowbridge and Penarth are taking virtually nothing in comparison.

Full text:

Rhoose a small settlement without major infrastructure is taking some 10 percent of the housing requirement with permissions outstanding at Rhoose Point and the new proposed development at Readers Way. This is a village which should not be taking such a high percentage of development when places like Llantwit Major Cowbridge and Penarth are taking virtually nothing in comparison.

Change suggested by respondent:

Reduction in the number of housing units in Rhoose until better infrastructure is provided. This would as a minimum include 2 trains per hour, 2 buses per hour, a comprehensive school, better retails and health facilities as well as improved road surface access. Until this happens Rhoose should be taking a maximum of 5percent of additional dwellings.

Sound: No

Attachments: None

5073 Object

Document Element: SP6 - HOUSING REQUIREMENT, Table 3: Spatial

Respondent: Mr Shayne Wilford [2132]

Summary:

Why are smaller communities taking the brunt of this housing drive. 1000's of houses in Rhoose, St Athan etc. Destroys community cohesion and identity and turns small communities in the Vale into identikit commuter deserts. Creating large high density (previously greenfield) estates to satisfy developers and the Authority's wish for higher planning gain should not take preference over brownfield sites in larger towns where more high rise could be considered to maximise numbers (like Cardiff & Cardiff Bay.

Full text:

Why are smaller communities taking the brunt of this housing drive. 1000's of houses in Rhoose, St Athan etc. Destroys community cohesion and identity and turns small communities in the Vale into identikit commuter deserts. Creating large high density (previously greenfield) estates to satisfy developers and the Authority's wish for higher planning gain should not take preference over brownfield sites in larger towns where more high rise could be considered to maximise numbers (like Cardiff & Cardiff Bay.

Change suggested by respondent:

Larger towns should take a larger share of developments/ Where are the sites in Barry, Penarth, Cowbridge, Llantwit Major? Larger towns will have a larger amount of brownfield development land - eg Barry Docks, Llandow. There is ample space for smaller better integrated developments in the rural vale that could be done without massive community upheaval and environmental damage.

Sound: No

Attachments: None

5117 Comment

Document Element: SP6 - HOUSING REQUIREMENT

Respondent: Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]

Summary:

The Level of Growth - Homes and Jobs
The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).

Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.

BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.

Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.

The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level of growth proposed in the plan.

We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.
Without prejudice to the Minster's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.
National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.

After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:
Annex 1 – General Conformity with Future Wales
• No significant concerns
Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)
• Spatial Strategy and Primary Settlements
• Housing and Economic Growth Levels – Regional Collaboration
• Maximising Affordable Housing Provision
• Delivery & Implementation – General
• Gypsy and Travellers
• Renewable Energy
• Minerals
• Best and Most Versatile Agricultural Land (BMV)
• Welsh Language

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.
My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.
Yours sincerely,
Neil Hemington
Chief Planner Welsh Government

Annex 1 - Statement of General Conformity
The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).
There is a joint position statement on the relationship between Bridgend, Cardiff and the Vale of Glamorgan (BP20A), which considers population growth, migration patterns, housing completions, employment characteristics, demographics, commuting and transport links between the three adjoining authorities. The Welsh Government supports the principle of this work which demonstrates how change in the Vale of Glamorgan relates and complements growth in adjoining local authorities. This approach illustrates a good mechanism for other local authorities to follow.
Reasons
Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the climate change and biodiversity emergencies, making the best use of resources.
Policy 1 and Policy 33 of Future Wales states that Cardiff, Newport, and the Valleys will be the main focus for growth and investment in the region. The strategic diagram (p163) also identifies the Vale of Glamorgan within the National Growth Area. The Vale of Glamorgan RLDP, specifically BP20A, provides robust evidence on the interrelationship and key issues with adjoining authorities, including their interaction and how they have shaped and influenced the scale/location of growth in the RLDP. This is set out in the three Joint Position Statements (JPSs).
BP45 'Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR), May 2024, provides further evidence on how the scale of growth indicated for the region has shaped the scale of future economic growth within the Vale of Glamorgan. This results in a higher level of employment growth in the Vale of Glamorgan primarily to increase self-containment and reduce out-flows to adjoining urban areas. Two key areas for future economic growth are identified at Cardiff Airport/Bro Tathan Enterprise Zone and Aberthaw Power Station.
The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.
On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):
Policy 1: Where will Wales grow
Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 6: Town Centre First
Policy 10: International Connectivity – Cardiff Airport
Policy 12 Regional Connectivity
Policy 33: National Growth Area – Cardiff, Newport and the Valleys
Policy 36: South-East Metro
Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.
With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.
The Level of Growth - Homes and Jobs
The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).
Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.
BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.
Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.
The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level of growth proposed in the plan.
We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The

past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.
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Jobs: The Council's 10-year dwelling-led growth option results in a requirement for 4,875 new jobs (325 p/a) over the plan period. This broadly aligns with the projected growth for 5,338 (355 p/a) new jobs in the Employment Land Review (BP12) and as set out in Policy SP14.
The level of employment growth proposed (5,338 jobs) over the plan period is below the target in the currently adopted plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.
In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of homes and jobs proposed in the plan, which is in general conformity with Future Wales.
Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.
The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.
Paragraph 6.137 of the plan states:
"Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary."
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?
Affordable Housing Exceptions Sites
Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.
Employment Land
The Council's Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the

over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).
Delivery and Implementation
PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.
The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.
The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have 'rolled over' from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.
The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters.
It will be for the Council to justify deliverability supported by robust financial viability.
Gypsy and Travellers
The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are 'immediate' by 2026. WG note that 4 pitches have since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

Policy SP9 identifies a site at Llangan (0.76Ha) to accommodate the 7 pitches needed. It will be for the Council to demonstrate the appropriate site selection assessment process has been followed and that the site complies with requirements in PPW (4.2.35), Circular 005/2018 (paragraph 35) any relevant guidance and the DPM (5.80-5.85) to allocate a deliverable site in the plan period. The views of the relevant statutory bodies must also be agreed with no outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.
Renewable Energy
Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Could the Council provide an update on alternative options for a DHN in Barry?
It is welcome that the Renewable Energy Assessment (REA) has considered BMV policy, specifically for solar PV, and use of the Predictive ALC Map. The assessment has only considered non-BMV land (Subgrade 3b, Grade 4 and 5). The assessment would benefit from referencing the clarification provided in the DCPO letter of 1st March 2022 in respect of solar PV and BMV agricultural land for completeness.
The study identifies that in the Vale of Glamorgan solar development is more suitable than wind energy because of the flight path of aircraft in the south of the County Borough. However, there are some opportunities for wind sites, but these are likely to be small (<10MW) where aviation risks are lower and there is some grid access. Conversely, there are large expanses of land suitable for solar areas (>10MW) to the West of the County Borough, where there is little existing development. The study identifies 20 large-scale solar areas but recognises that grid constraints may impact the ability of sites to come forward.
Solar and wind search areas (where appropriate) below the 10MW Developments of National Significance (DNS) have been identified (Policy CC3). The plan also includes a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW (Policy CC4). Policy CC3 makes reference to adhering to the criteria in Policy CC4. However, would it not be the case that if search areas have been identified in Policy CC3 have they not already met the criteria? If they would not, should they be identified in the first place? Clarity would be beneficial. The Welsh Government supports the approach but seeks clarity on the point raised.
The Welsh Government notes the proposed search areas for wind energy near Morfa Ystrad Owen/Nant Rhydhalog, according to the Peatlands of Wales Evidence Score Map, the search area includes areas of peatland (Evidence Score 4). The site is also a SINC. This raises concerns as to how the inclusion of this search areas meets the policy test in PPW 6.4.15, 1a and 1b (Stepwise) regarding avoidance of irreplaceable peatland habitats and PPW 6.4.34.
Policy CC4 refers to Developments of National Significance (DNS) in 6.344 and 6.346. This should now refer to Strategic Infrastructure Projects (SIP) which replaced DNS.
Minerals
The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in the Vale of Glamorgan. The Welsh Government policy clarification letter (dated 11 November 2021) identifies a surplus of 1.68mt of crushed rock. As there is a surplus of crushed rock reserves and a lack of sand and gravel production in the Vale, no specific allocations are required in the replacement plan. It is unclear whether a Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region been agreed, or does the latest Position Statement (July 2022) explain how any shortfall will be met across 9

the region, particularly for crushed rock, of which the Vale has a surplus? Clarification would be beneficial.
BMV Agricultural Land
The Welsh Government has engaged with the Council for land quality advice, survey advice and ALC survey validation for candidate sites. The LPA has produced a specific topic paper on BMV policy application. BP23A. The Deposit RLDP allocates 188 hectares of housing land, 5.62 ha is identified as BMV land (under 3% of total housing allocations). The RLDP:
• Has sought to avoid BMV land wherever possible;
• Uses the Predictive ALC Map as a core evidence layer to inform: The spatial strategy;
• Settlement hierarchy decisions; and
• Candidate site assessments.
•
• Directs strategic growth to areas with least BMV land
• Removes or avoids allocations where BMV impacts were significant or unjustified.
• Quantifies total BMV loss and demonstrates it is minimal (5.62ha) and proportionate at plan level.
• Applies a sequential approach through: Preference for brownfield and non-BMV sites;
• Replacement of higher-BMV sites with lower-grade alternatives where possible.
•
• Requires site-specific ALC surveys to verify actual land quality before allocation.
• Demonstrates that allocated BMV land is: Often small, fragmented, or constrained;
• Sometimes previously disturbed or incapable of being farmed differently from surrounding lower-grade land; and
• Necessary to deliver the Plan's housing strategy where reasonable alternatives are unavailable.
•

In conclusion, the Welsh Government consider the Authority has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy, and on that basis no objection is offered.
Green Infrastructure
Policy SP19 should explicitly reference the need for development to be accompanied by a Green Infrastructure Statement.
PPW12 requires decision makers to apply the step wise approach to GI, with enhancement secured at every stage where possible, there is no distinction made between the quality of the GI assets – the qualification in the policy statement that states proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure should be redrafted to remove the quality reference. The need to avoid an impact in the first instance should also be explicitly incorporated into the policy.
Criterion 1 (Policy SP20) should be redrafted – the stepwise approach in PPW 12 6.4.15 1a - does not distinguish between relative ecological value – the avoidance step applies to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.
Welsh Language
There is limited reference to the Welsh language in the plan, either potential adverse impacts arising through development, or mechanisms via a policy framework to support and grow the use of the language. There are references to a number of Welsh-medium schools (3.26) and the increase in the number of people able to speak Welsh according to the 2011 census (3.52) but there is no mention of the authority's Welsh Language Strategy or promoting or cross-referencing to the aims of 10

Cymraeg 2050: A million Welsh-speakers. Paragraph 6.81 of the plan refers to development north west of Barry:
"Land at North West Barry is allocated for a residential development of up to 376 dwellings and public open space. The site is in a sustainable location on the edge of the Barry, a key settlement, in a location that is well served by services and facilities, including a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium and Church in Wales) and two high schools (English and Welsh Medium) all located in reasonable walking distance. There is an active travel route along Port Road West, bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry. Barry station is 1.3 miles from the site entrance."
There is no mention that the Council want to undertake a Welsh Language Impact Assessment (WLIA) so there appears no attempt to measure the impact on the Welsh schools resulting from housing development? Could the Council clarify if such implications have already been covered in the WLIA for the plan, ISA, or are any specific policies necessary?

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/syf

5118 Support

Document Element: SP6 - HOUSING REQUIREMENT, Table 2: Housing Supply

Respondent: Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]

Summary:

The Welsh Government notes that BP0A identifies small and large windfalls, based on historic trends of 53/yr and 80/yr respectively. Also, the large windfalls are not included in the first two years of the trajectory, as per the DPM. A non-delivery allowance of 5% is identified, which reflects local characteristics in the Vale of Glamorgan. A flexibility allowance of 9.8% has been factored into the provision. The Welsh Government supports this approach, although whilst Appendix 1 contains a housing trajectory, there is no table to mirror that of Table 21, DPM. This should be included in Appendix 1.

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.
Without prejudice to the Minster's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.
National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.
After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:
Annex 1 – General Conformity with Future Wales
• No significant concerns
Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)
• Spatial Strategy and Primary Settlements
• Housing and Economic Growth Levels – Regional Collaboration
• Maximising Affordable Housing Provision
• Delivery & Implementation – General
• Gypsy and Travellers
• Renewable Energy
• Minerals
• Best and Most Versatile Agricultural Land (BMV)
• Welsh Language

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.
My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.
Yours sincerely,
Neil Hemington
Chief Planner Welsh Government

Annex 1 - Statement of General Conformity
The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).
There is a joint position statement on the relationship between Bridgend, Cardiff and the Vale of Glamorgan (BP20A), which considers population growth, migration patterns, housing completions, employment characteristics, demographics, commuting and transport links between the three adjoining authorities. The Welsh Government supports the principle of this work which demonstrates how change in the Vale of Glamorgan relates and complements growth in adjoining local authorities. This approach illustrates a good mechanism for other local authorities to follow.
Reasons
Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the climate change and biodiversity emergencies, making the best use of resources.
Policy 1 and Policy 33 of Future Wales states that Cardiff, Newport, and the Valleys will be the main focus for growth and

investment in the region. The strategic diagram (p163) also identifies the Vale of Glamorgan within the National Growth Area. The Vale of Glamorgan RLDP, specifically BP20A, provides robust evidence on the interrelationship and key issues with adjoining authorities, including their interaction and how they have shaped and influenced the scale/location of growth in the RLDP. This is set out in the three Joint Position Statements (JPSs).
BP45 'Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR), May 2024, provides further evidence on how the scale of growth indicated for the region has shaped the scale of future economic growth within the Vale of Glamorgan. This results in a higher level of employment growth in the Vale of Glamorgan primarily to increase self-containment and reduce out-flows to adjoining urban areas. Two key areas for future economic growth are identified at Cardiff Airport/Bro Tathan Enterprise Zone and Aberthaw Power Station.
The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.
On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):
Policy 1: Where will Wales grow
Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 6: Town Centre First
Policy 10: International Connectivity – Cardiff Airport
Policy 12 Regional Connectivity
Policy 33: National Growth Area – Cardiff, Newport and the Valleys
Policy 36: South-East Metro
Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.
With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.
The Level of Growth - Homes and Jobs
The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).
Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.
BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in

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Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.
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Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.
The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.
Paragraph 6.137 of the plan states:

"Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary."
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?
Affordable Housing Exceptions Sites
Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.
Employment Land
The Council's Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).
Delivery and Implementation
PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.
The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.
The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have 'rolled over' from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.
The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters.
It will be for the Council to justify deliverability supported by robust financial viability.
Gypsy and Travellers
The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are 'immediate' by 2026. WG note that 4 pitches have since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

Policy SP9 identifies a site at Llangan (0.76Ha) to accommodate the 7 pitches needed. It will be for the Council to demonstrate the appropriate site selection assessment process has been followed and that the site complies with requirements in PPW (4.2.35), Circular 005/2018 (paragraph 35) any relevant guidance and the DPM (5.80-5.85) to allocate a deliverable site in the plan period. The views of the relevant statutory bodies must also be agreed with no outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.
Renewable Energy
Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Could the Council provide an update on alternative options for a DHN in Barry?
It is welcome that the Renewable Energy Assessment (REA) has considered BMV policy, specifically for solar PV, and use of the Predictive ALC Map. The assessment has only considered non-BMV land (Subgrade 3b, Grade 4 and 5). The assessment would benefit from referencing the clarification provided in the DCPO letter of 1st March 2022 in respect of solar PV and BMV agricultural land for completeness.
The study identifies that in the Vale of Glamorgan solar development is more suitable than wind energy because of the flight path of aircraft in the south of the County Borough. However, there are some opportunities for wind sites, but these are likely to be small (<10MW) where aviation risks are lower and there is some grid access. Conversely, there are large

expanses of land suitable for solar areas (>10MW) to the West of the County Borough, where there is little existing development. The study identifies 20 large-scale solar areas but recognises that grid constraints may impact the ability of sites to come forward.
Solar and wind search areas (where appropriate) below the 10MW Developments of National Significance (DNS) have been identified (Policy CC3). The plan also includes a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW (Policy CC4). Policy CC3 makes reference to adhering to the criteria in Policy CC4. However, would it not be the case that if search areas have been identified in Policy CC3 have they not already met the criteria? If they would not, should they be identified in the first place? Clarity would be beneficial. The Welsh Government supports the approach but seeks clarity on the point raised.
The Welsh Government notes the proposed search areas for wind energy near Morfa Ystrad Owen/Nant Rhydhalog, according to the Peatlands of Wales Evidence Score Map, the search area includes areas of peatland (Evidence Score 4). The site is also a SINC. This raises concerns as to how the inclusion of this search areas meets the policy test in PPW 6.4.15, 1a and 1b (Stepwise) regarding avoidance of irreplaceable peatland habitats and PPW 6.4.34.
Policy CC4 refers to Developments of National Significance (DNS) in 6.344 and 6.346. This should now refer to Strategic Infrastructure Projects (SIP) which replaced DNS.
Minerals
The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in the Vale of Glamorgan. The Welsh Government policy clarification letter (dated 11 November 2021) identifies a surplus of 1.68mt of crushed rock. As there is a surplus of crushed rock reserves and a lack of sand and gravel production in the Vale, no specific allocations are required in the replacement plan. It is unclear whether a Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region been agreed, or does the latest Position Statement (July 2022) explain how any shortfall will be met across 9

the region, particularly for crushed rock, of which the Vale has a surplus? Clarification would be beneficial.
BMV Agricultural Land
The Welsh Government has engaged with the Council for land quality advice, survey advice and ALC survey validation for candidate sites. The LPA has produced a specific topic paper on BMV policy application. BP23A. The Deposit RLDP allocates 188 hectares of housing land, 5.62 ha is identified as BMV land (under 3% of total housing allocations). The RLDP:
• Has sought to avoid BMV land wherever possible;
• Uses the Predictive ALC Map as a core evidence layer to inform: The spatial strategy;
• Settlement hierarchy decisions; and
• Candidate site assessments.
•
• Directs strategic growth to areas with least BMV land
• Removes or avoids allocations where BMV impacts were significant or unjustified.
• Quantifies total BMV loss and demonstrates it is minimal (5.62ha) and proportionate at plan level.
• Applies a sequential approach through: Preference for brownfield and non-BMV sites;
• Replacement of higher-BMV sites with lower-grade alternatives where possible.
•
• Requires site-specific ALC surveys to verify actual land quality before allocation.
• Demonstrates that allocated BMV land is: Often small, fragmented, or constrained;
• Sometimes previously disturbed or incapable of being farmed differently from surrounding lower-grade land; and
• Necessary to deliver the Plan's housing strategy where reasonable alternatives are unavailable.
•

In conclusion, the Welsh Government consider the Authority has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy, and on that basis no objection is offered.
Green Infrastructure
Policy SP19 should explicitly reference the need for development to be accompanied by a Green Infrastructure Statement.
PPW12 requires decision makers to apply the step wise approach to GI, with enhancement secured at every stage where possible, there is no distinction made between the quality of the GI assets – the qualification in the policy statement that states proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure should be redrafted to remove the quality reference. The need to avoid an impact in the first instance should also be explicitly incorporated into the policy.
Criterion 1 (Policy SP20) should be redrafted – the stepwise approach in PPW 12 6.4.15 1a - does not distinguish between relative ecological value – the avoidance step applies to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.
Welsh Language
There is limited reference to the Welsh language in the plan, either potential adverse impacts arising through development, or mechanisms via a policy framework to support and grow the use of the language. There are references to a number of Welsh-medium schools (3.26) and the increase in the number of people able to speak Welsh according to the 2011 census (3.52) but there is no mention of the authority's Welsh Language Strategy or promoting or cross-referencing to the aims of 10

Cymraeg 2050: A million Welsh-speakers. Paragraph 6.81 of the plan refers to development north west of Barry: "Land at North West Barry is allocated for a residential development of up to 376 dwellings and public open space. The

site is in a sustainable location on the edge of the Barry, a key settlement, in a location that is well served by services and facilities, including a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium and Church in Wales) and two high schools (English and Welsh Medium) all located in reasonable walking distance. There is an active travel route along Port Road West, bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry. Barry station is 1.3 miles from the site entrance."
There is no mention that the Council want to undertake a Welsh Language Impact Assessment (WLIA) so there appears no attempt to measure the impact on the Welsh schools resulting from housing development? Could the Council clarify if such implications have already been covered in the WLIA for the plan, ISA, or are any specific policies necessary?

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/syf

5455 Object

Document Element: SP6 - HOUSING REQUIREMENT

Respondent: Mr David Entwistle [3264]

Summary:

The housing requirement stated by the plan seems unsustainable and unrealistic. If only two if the key sites were to fall through the the amount of houses supposedly required cannot be reached. The figures around required housing for a start are questionable. Migration from outside the Vale taking up housing stock needs to be addressed. Priority should be given to the well being and daily lives of existing residents first and foremost and housing for people born within the Vale.

Full text:

The housing requirement stated by the plan seems unsustainable and unrealistic. If only two if the key sites were to fall through the the amount of houses supposedly required cannot be reached. The figures around required housing for a start are questionable. Migration from outside the Vale taking up housing stock needs to be addressed. Priority should be given to the well being and daily lives of existing residents first and foremost and housing for people born within the Vale.

Change suggested by respondent:

The amount housing required needs to be more realistically recalculated and priority given to housing for people born and already living within the Vale. The issue of migration from outside the area placing additional stress on the limited housing stock needs to be addressed first and foremost. The employment land goals should also be greater and be aligned with solid infrastructure improvements to actually encourage real long term sustainable business to move to the area.

Sound: No

Attachments: None

5633 Object

Document Element: SP6 - HOUSING REQUIREMENT

Respondent: Mrs Karine Dubois-Jones [3322]

Summary:

Where do those figures come from? Aren't they over estimated for the Vale?
Many houses have been built in the last few years but the infrastructure has NOT been improved, especially the transport system and the medical centre under much pressure as it is. Driving around the Vale and into Cardiff is becoming a nightmare and causing much stress to workers (not everyone works from home!!) and families.

Full text:

Where do those figures come from? Aren't they over estimated for the Vale?
Many houses have been built in the last few years but the infrastructure has NOT been improved, especially the transport system and the medical centre under much pressure as it is. Driving around the Vale and into Cardiff is becoming a nightmare and causing much stress to workers (not everyone works from home!!) and families.

Change suggested by respondent:

Could not exisiting buildings which are abandoned be repurposed? Instead of using green land and crucial farming areas, could not more brown land be used?

Sound: No

Attachments: None

5644 Object

Document Element: SP6 - HOUSING REQUIREMENT, Table 3: Spatial

Respondent: Mrs Barbara Entwistle [2589]

Summary:

Housing sites are concentrated around Barry, Rhoose St Athan which will create an enormous traffic problem on Port Rd West which is heavily congested at peak times.
The allocation of new housing does not take into consideration the services such as healthcare & schools which are already over subscribed.

Full text:

Housing sites are concentrated around Barry, Rhoose St Athan which will create an enormous traffic problem on Port Rd West which is heavily congested at peak times.
The allocation of new housing does not take into consideration the services such as healthcare & schools which are already over subscribed.

Change suggested by respondent:

Scrap the existing LDP & come up with an LDP that is fair for all Vale residents & spread out smaller developments in all areas of covered by the Vale not just large developments in Barry St Athan & Rhoose.

Sound: No

Attachments: None

5940 Object

Document Element: SP6 - HOUSING REQUIREMENT

Respondent: HBF (Mr Mark Harris) [538]

Summary:

The housing requirement and the number of homes delivered through new allocations should be increased to make the plan more ambitious and align with Future Wales and the Vales' identified role as a national growth area.

The flexibility allowance should be increased to 15%. The Development Plan Manual 3 suggests 10% should be the starting point. A higher figure is considered appropriate due to the low level of new allocations and the limited number of key sites allocated in the plan. This means the plan has a heavy reliance on a small number of sites, which would suggest the need for greater flexibility provided through a range of additional smaller sites.

Full text:

The housing requirement and the number of homes delivered through new allocations should be increased to make the plan more ambitious and align with Future Wales and the Vales' identified role as a national growth area.

The flexibility allowance should be increased to 15%. The Development Plan Manual 3 suggests 10% should be the starting point. A higher figure is considered appropriate due to the low level of new allocations and the limited number of key sites allocated in the plan. This means the plan has a heavy reliance on a small number of sites, which would suggest the need for greater flexibility provided through a range of additional smaller sites.

Change suggested by respondent:

Increase flexibility to 15%.

Increase the number of dwellings on allocated sites and increase the range of site sizes allocated.

Sound: Yes

Attachments: None

6018 Object

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:

Even with this 9.8% flexibility allowance in place, 8,660 is still 10.0% lower than the predicted household increase of 9,623 in the Vale of Glamorgan based on Welsh Government's 2022-based household projections for VoG over the RLDP period.

BDWR endorses the incorporation of a flexibility allowance, as is required by paragraph 5.59 of the Development Plans Manual (2020). However, it is considered that the flexibility allowance needs to be increased to a minimum of 15-20% (like Monmouthshire and Swansea respectively) to ensure that the ambitious anticipated annual build rate of between 885-906 dpa from 2027/28 to 2030/31 can be achieved.

Full text:

The 8,660 provision equates to a flexibility allowance of 9.8% against the targeted delivery of 7,890 set out in Policy SP1. Even with this flexibility allowance in place, this is still 10.0% lower than the predicted household increase of 9,623 in the Vale of Glamorgan based on Welsh Government's 2022-based household projections for VoG over the RLDP period.

BDWR endorses the incorporation of a flexibility allowance, as is required by paragraph 5.59 of the Development Plans Manual (2020). However, it is considered that the flexibility allowance needs to be increased to a minimum of 15-20% to ensure that the ambitious anticipated annual build rate of between 885-906 dpa from 2027/28 to 2030/31 can be achieved. Whilst we note that the Development Management Manual references a starting point of 10% we note that other local authorities have utilised a higher percentage in draft plans. This includes Swansea (20%) and Monmouthshire (15%).

Change suggested by respondent:

In order for Policy SP6 to meet the third test of soundness (Will the plan deliver?), it is evident that additional sites will need to be allocated and existing allocated sites will need to be expanded to accommodate further dwelling numbers. Allocation HG4(1) is potentially capable of delivering greater than the 25 dwellings currently allocated.

Sound: No
Attachments: None

6050 Object

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Mrs Gill Sims-Williams [654]

Summary:

RHOOSE READERS WAY:
Policy SP6- Rhoose seeing high order settlements than any other Vale Village. Object strongly to the massive amount of houses planned for readers way.

Full text:

RHOOSE READERS WAY:
Policy SP6- Rhoose seeing high order settlements than any other Vale Village. Object strongly to the massive amount of houses planned for readers way.
HG1 KS3 - Access to this enormous estate on Readers Way is ridiculously inadequate. Accident waiting to happen. Flooding is problematic already, this will get much worse when all these new dwellings are built. Who is ultimately responsible and who will be accountable for future flooding when VOG already knows the worries here?

I object strongly to all the new housing planned for Readers Way Rhoose.

Change suggested by respondent:

-

Sound: Not specified
Attachments:
Paper Representation Redacted - https://valeofglamorgan.oc2.uk/a/4rc

6054 Object

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:

The RLDP's proposed housing target of 526 dwellings per year over ten years is unambitious, as recent delivery exceeded this figure outside pandemic years. The target is based on past averages, which include periods of low delivery, and ignores demographic trends and unmet needs. Given the Vale of Glamorgan's role within the National Growth Area in Future Wales, maintaining historic delivery rates does not reflect its strategic importance or the national policy emphasis on growth, making the current target insufficient and not aligned with its designated growth role.

Full text:

Element 1 of the RLDP Sustainable Growth Strategy commits to "Delivering a sustainable level of housing and employment growth to accord with the Vale's position within the Cardiff Capital Region." The supporting text sets out that the RLDP will make provision for 7,890 dwellings over the RLDP period (526dpa), plus a flexibility allowance.

Supporting paragraph 5.8 states that: "The level of growth proposed is based on average completions over the first ten years of the adopted plan period (526 dwellings per annum). This reflects an appropriate timeframe, encompassing a period of low housing completions following the economic recession and the more recent boom years following the adoption of the LDP and delivery of allocated sites. This level of growth has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area. It also addresses the acute need for affordable housing, whilst being achievable within the limitations of the natural and built environment."

It is considered that basing the future level of growth on the average completions over the last decade is far from ambitious enough to the level of housing that is actually required in VoG in the RLDP period. The last 10 years includes periods of unprecedentedly low housing delivery, for example during the Covid pandemic where, according to the Consultation Evidence Base (Housing Land Supply and Housing Trajectory December 2025), only 431 and 354 additional dwellings were delivered in 2021-22 and 2022-23 respectively. Basing housing growth on past trends in average completions takes no account of emerging demographic trends or any backlog of unmet need and does not comply with the approach set out in the Development Plans Manual. It is observed that delivery in the remaining six out of the last 10 years exceeded 526 dwellings per annum. This demonstrates that delivery within the VoG has operated above the proposed housing requirement for the RLDP period in recent times (with the exception of covid years) which provides a high level of confidence that a higher housing target could realistically be achieved.

The level of housing growth for the RLDP is therefore unambitious, particularly given that the Vale of Glamorgan sits within a National Growth Area ('NGA') in Policy 1 (Where Wales will grow) of Future Wales. Policy 33 (NGA – Cardiff, Newport and the Valleys) states that: "Local Development Plans should recognise the National Growth Area as the focus for strategic economic and housing growth; essential services and facilities; advanced manufacturing; transport and digital infrastructure." As such, pursuing an approach to future delivery which seeks to maintain historic delivery rates is not reflective of Vale of Glamorgan's role within a NGA and lacks the level of ambition for the area set out in national planning policy. The previous LDP was adopted at a period of time before Future Wales was published. Therefore pursuing an approach that seeks to maintain historic delivery rates is not considered to reflect the enhanced role that the Vale of Glamorgan has as a result of its designation as part of a national growth area within Future Wales. It is illogical that the annual requirement has gone down from the figure in the adopted LDP when the local area has been categorised as part of a national growth area in Future Wales.

Change suggested by respondent:

As set out in our representations to RLDP Policy SP1 and SP6, the level of housing growth in the VoG should be far more aspirational than currently set out in the RLDP.

Sound: No
Attachments: None

6057 Object

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:

Policy SP1's target of 7,890 dwellings, including 3,070 affordable homes, is insufficient to meet current and projected housing needs in VoG, which are estimated to require over 10,000 dwellings to address demographic growth and backlog unmet needs. The proposed flexibility allowance of 9.8% should be increased to 15-20% (like in Monmouthshire and Swansea) to achieve the ambitious build rate set out in the Housing Trajectory. Policy SP1 does not adequately account for the actual demand, particularly for affordable housing, which is significantly under-provided relative to identified needs.

Full text:

Policy SP1 sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP6 states that: "to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036. This will be delivered by:
• 3,837 dwellings from the existing land supply
• 3,520 dwellings on allocated sites
• 1,303 dwellings from large and small windfall developments"

The 8,660 provision equates to a flexibility allowance of 9.8% against the targeted delivery of 7,890 set out in Policy SP1. BDWR endorses the incorporation of a flexibility allowance, as is required by paragraph 5.59 of the Development Plans Manual (2020). However, it is considered that the flexibility allowance needs to be increased to a minimum of 15-20% to ensure that the ambitious anticipated annual build rate of between 885-906 dpa from 2027/28 to 2030/31 can be achieved. Whilst we note that the Development Management Manual references a starting point of 10% we note that other local authorities have utilised a higher percentage in draft plans. This includes Swansea (20%) and Monmouthshire (15%).

The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections (published in November 2025), the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets for in Policy SP1.

However, the Development Plan Manual (para 5.37) also requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more that the RLDP seeks to deliver in Policy SP1.

It is therefore evident that the housing requirement figure proposed in Policy SP1 is insufficient to meet the newly arising needs of VoG for the RLDP period. Neither does the proposed housing requirement make sufficient allowance for meeting the backlog of unmet affordable housing need.

A fundamental review of the housing requirement figure is required to reflect the most up to date demographic information (i.e. the 2022 household projections) as set out in the Development Plan Manual. The housing requirement figure should also be further adjusted upwards to ensure that existing backlogs of unmet housing need can be addressed and reflect the plans aspirations for economic growth and social inclusion.

Paragraph 5.34 of the Development Plans Manual (2020) states that:

"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base."

Paragraph 5.35 states:

"…All LPAs should use these projections and the resultant household numbers when considering the level of housing provision for a plan period"

Whilst we understand that the latest household projections were not available at the time of drafting the deposit LDP it is clear that these will need to be revisited. We note that the Inspector examining the Cardiff, Monmouthshire and Carmarthenshire LDPs have asked the authorities to review the implications of the data.

As such, it is evident that the housing requirement and the sites identified for development is insufficient to meet the actual housing needs of VoG during the RLDP period.

It is important to note that the above calculations are purely to meet newly arising need and does not make any allowance for existing unmet affordable housing needs. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SP1 seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. Taking account of the existing unmet need will push the housing requirement even higher.

The number of affordable homes identified in Policy SP1 and Policy SP6 therefore falls drastically short of the actual need for affordable homes in VoG for the RLDP period.

Change suggested by respondent:

In order for Policy SP1 and SP6, to achieve Test 2 (Is the Plan appropriate?) and Test 3 (Will the Plan deliver?), Policy SP1 and SP6 must be updated to accommodate a greater level of housing delivery based on the most up-to-date evidence.

Policy SP1 also states that: "The primary focus of housing growth within the Vale shall be within the Strategic Growth Area as identified on the Key Diagram. New housing developments will be concentrated in the following locations, which are served by existing public transport routes and provide the opportunity to enhance sustainable transport connectivity:
• Barry
• Penarth
• Llantwit Major
• Cowbridge
• Dinas Powys
• Rhoose
• St Athan
• Llandough
• Sully
Outside of the Strategic Growth Area, the allocation of new sites will be limited to small-scale affordable housing led sites in appropriate primary and Minor Rural Settlements."

In order to accommodate the additional level of housing growth the VoG needs, both the Strategic Growth Area settlements, and the Primary and Minor Rural Settlements will need to be allocated additional housing sites. Land at Primrose Hill, Cowbridge (Site ID: 455) can assist greatly in accommodating this additional housing need in a sustainable location. The site is adjacent to the higher order Strategic Growth Area settlement of Cowbridge, has limited physical and environmental constraints and is capable of providing up to 220 dwellings at a density of 35 dwellings per hectare.

Sound: No

Attachments: None

6060 Object

Document Element: SP6 - HOUSING REQUIREMENT

Respondent: Barratt Redrow Homes [2669]

Agent: Lichfields

Summary:

Policy SP6 plans for 8,660 homes comprising a 9.8% flexibility allowance on a target of 7,890. This should be increased to 15-20% (like in Monmouthshire and Swansea) to meet the ambitious build rate set out in the Housing Trajectory. Household projections indicate a 22% increase from 57,676 to 67,299 by 2036, requiring approximately 10,008 dwellings, which exceeds the current target in the RLDP. Policy SP1 and SP6 do not sufficiently address unmet affordable housing needs as the 2023 LHMA identifies a need for 1,075 affordable dpa over the next 5-years based on principal projections or 1,114 based on RLDP projections.

Full text:

Policy SP6 states that: "to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036. This will be delivered by:
• 3,837 dwellings from the existing land supply
• 3,520 dwellings on allocated sites
• 1,303 dwellings from large and small windfall developments"

The 8,660 provision equates to a flexibility allowance of 9.8% against the targeted delivery of 7,890 set out in Policy SP1. BDWR endorses the incorporation of a flexibility allowance, as is required by paragraph 5.59 of the Development Plans Manual (2020). However, it is considered that the flexibility allowance needs to be increased to a minimum of 15-20% to ensure that the ambitious anticipated annual build rate of between 885-906 dpa from 2027/28 to 2030/31 can be achieved. Whilst we note that the Development Management Manual references a starting point of 10% we note that other local authorities have utilised a higher percentage in draft plans. This includes Swansea (20%) and Monmouthshire (15%).

The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections (published in November 2025), the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets for in Policy SP1.

However, the Development Plan Manual (para 5.37) also requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more that the RLDP seeks to deliver in Policy SP1.

It is therefore evident that the housing requirement figure proposed in Policy SP1 is insufficient to meet the newly arising needs of VoG for the RLDP period. Neither does the proposed housing requirement make sufficient allowance for meeting the backlog of unmet affordable housing need.

A fundamental review of the housing requirement figure is required to reflect the most up to date demographic information (i.e. the 2022 household projections) as set out in the Development Plan Manual. The housing requirement figure should also be further adjusted upwards to ensure that existing backlogs of unmet housing need can be addressed and reflect the plans aspirations for economic growth and social inclusion.

Paragraph 5.34 of the Development Plans Manual (2020) states that:

"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base."

Paragraph 5.35 states:

"…All LPAs should use these projections and the resultant household numbers when considering the level of housing provision for a plan period"

Whilst we understand that the latest household projections were not available at the time of drafting the deposit LDP it is clear that these will need to be revisited. We note that the Inspector examining the Cardiff, Monmouthshire and Carmarthenshire LDPs have asked the authorities to review the implications of the data.

As such, it is evident that the housing requirement and the sites identified for development is insufficient to meet the actual housing needs of VoG during the RLDP period.

It is important to note that the above calculations are purely to meet newly arising need and does not make any allowance for existing unmet affordable housing needs. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SP1 seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. Taking account of the existing unmet need will push the housing requirement even higher.

The number of affordable homes identified in Policy SP1 and Policy SP6 therefore falls drastically short of the actual need for affordable homes in VoG for the RLDP period.

Change suggested by respondent:

In order for Policy SP1 and SP6, to achieve Test 2 (Is the Plan appropriate?) and Test 3 (Will the Plan deliver?), Policy SP1 and SP6 must be updated to accommodate a greater level of housing delivery based on the most up-to-date evidence.

In order to accommodate the additional level of housing growth the VoG needs, both the Strategic Growth Area settlements, and the Primary and Minor Rural Settlements will need to be allocated additional housing sites. Land at Primrose Hill, Cowbridge (Site ID: 455) can assist greatly in accommodating this additional housing need in a sustainable location. The site is adjacent to the higher order Strategic Growth Area settlement of Cowbridge, has limited physical and environmental constraints and is capable of providing up to 220 dwellings at a density of 35 dwellings per hectare.

Sound: No

Attachments: None

6076 Comment

Document Element: SP6 - HOUSING REQUIREMENT, Table 3: Spatial

Respondent: Barratt Redrow Homes [2669]

Agent: Lichfields

Summary:

Cowbridge comprises a sustainable self-contained settlement with regards to access to services such as primary and secondary schools, shops including supermarkets, medical services at the medical practice and pharmacy, sports activities including a leisure centre, a library and places of worship. Cowbridge has excellent connections to the A48 with regular bus services that provide access to Cardiff, Porthcawl and Llantwit Major. In order for the RLDP to achieve the second test of soundness (Is the Plan appropriate?), more housing growth should be located at Cowbridge owing to its sustainable location as a Service Centre Settlement.

Full text:

Policy SP10 seeks to encourage a modal shift towards sustainable forms of transport through “siting new developments in sustainable and accessible locations where a range of services and facilities are within walking and cycling distance.”

Cowbridge comprises a sustainable self-contained settlement with regards to access to services such as primary and secondary schools, shops including supermarkets, medical services at the medical practice and pharmacy, sports activities including a leisure centre, a library and places of worship. Cowbridge has excellent connections to the A48 with regular bus services that provide access to Cardiff, Porthcawl and Llantwit Major. In order for the RLDP to achieve the second test of soundness (Is the Plan appropriate?), more housing growth should be located at Cowbridge owing to its sustainable location as a Service Centre Settlement.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6619 Comment

Document Element: SP6 - HOUSING REQUIREMENT

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.

All Welsh Government funded homes MUST meet secured by Design Gold or in the case of a refurbishment Silver.
Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.
We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.
Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.
Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the

adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where "qualifying activities" take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:

Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states 'The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.'
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery. Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)
identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible

and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.
South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at: https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.

• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.

• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.

• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a

new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

6686 Comment

Document Element: SP6 - HOUSING REQUIREMENT, Table 3: Spatial

Respondent: Powells (Mr Stuart Leaver, Head of Planning & Land Promotion) [887]

Summary:

The Deposit RLDP identifies Culverhouse Cross as a Primary Settlement outside the Strategic Growth Area within the settlement hierarchy. However, despite this designation, the RLDP allocates no housing growth whatsoever within Culverhouse Cross.

This creates a clear inconsistency between the settlement hierarchy and the spatial distribution of development. If a settlement is identified within the hierarchy as capable of supporting development, the development plan should logically identify opportunities through which that growth can occur. The absence of any allocations, windfall capacity or clearly defined delivery mechanisms means that the designation has no practical effect within the spatial strategy.

The failure to allocate development in Culverhouse Cross has several important consequences for the effectiveness of the Plan.
• Unmet Local Housing Need – Local affordable housing needs within the Wenvoe ward are not addressed within the spatial distribution of development. The RLDP therefore fails to demonstrate how identified housing need within this part of the authority will be met.
• Ineffective Settlement Hierarchy – The settlement hierarchy fails to operate as a meaningful spatial planning tool. If Primary Settlements are not expected to accommodate any development, the distinction between settlement tiers becomes blurred and the hierarchy ceases to function as a mechanism for directing growth.
• Displacement of Development Pressure – Housing demand associated with the eastern Vale is displaced to other settlements rather than being distributed across the settlement network in accordance with the hierarchy. This results in an imbalanced spatial strategy.
•Loss of Sustainable Small-Scale Opportunities – Opportunities for small-scale affordable housing delivery in locations close to employment, services and public transport are lost. This is particularly relevant in the case of Culverhouse Cross which functions as a significant employment and retail centre.
• Policy Mechanisms That Cannot Operate – The Plan relies on affordable housing exception mechanisms to deliver housing within settlements such as Culverhouse Cross. However, the extent of Green Wedge designation means that these mechanisms cannot realistically function without explicit clarification within the Plan.

Taken together these issues demonstrate that the current spatial strategy does not fully respond to the functional role of Culverhouse Cross within the settlement hierarchy and results in a distribution of development that is neither balanced nor responsive to local housing needs.

Full text:

1. Introduction
This representation is submitted on behalf of Powells as land promoters of Candidate Site CS387 at Culverhouse Cross. The representation seeks to set out our comments on the RLDP draft deposit as well as set forward the case for the allocation of the site within the Vale of Glamorgan Replacement Local Development Plan (RLDP) for residential development of up to 50 dwellings, including a minimum of 50% affordable housing.

The site presents a deliverable, sustainable and policy-aligned opportunity to address significant affordable housing need within the Wenvoe housing market area. Despite Culverhouse Cross being identified as a Primary Settlement within the RLDP settlement hierarchy, the Deposit Plan does not allocate any residential development within the settlement. This approach results in a number of fundamental inconsistencies within the Plan including:
• A settlement hierarchy that identifies Culverhouse Cross as a Primary Settlement but provides no growth.
• Evidence of significant affordable housing need within the Wenvoe ward that is not spatially addressed.
• Policy mechanisms intended to support affordable housing delivery (HG4 and HG5) that cannot realistically operate due to Green Wedge constraints.
• A spatial strategy that places disproportionate emphasis on rail-based settlements despite national policy promoting a wider placemaking-led approach to sustainability.
The representation therefore demonstrates that the RLDP is unsound in respect of Culverhouse Cross and that Candidate Site CS387 represents a sustainable and deliverable allocation capable of addressing identified housing need.

2. Settlement Hierarchy and Spatial Strategy
2.1 Primary Settlement Status
The Deposit RLDP identifies Culverhouse Cross as a Primary Settlement outside the Strategic Growth Area within the settlement hierarchy. Under Policy SP2, Primary Settlements represent the highest tier of settlement outside the strategic growth corridor and are identified as locations capable of accommodating limited but proportionate levels of development, reflecting their relative accessibility, services, employment opportunities and role within the wider settlement network.
In spatial planning terms, the identification of a settlement as a Primary Settlement carries clear strategic implications. It indicates that the settlement performs an important functional role within the authority and that it represents one of the most sustainable locations for accommodating development outside the Strategic Growth Area. The hierarchy therefore provides the principal framework through which the Plan distributes housing growth across the authority.
However, despite this designation, the RLDP allocates no housing growth whatsoever within Culverhouse Cross.
This creates a clear inconsistency between the settlement hierarchy and the spatial distribution of development. If a settlement is identified within the hierarchy as capable of supporting development, the development plan should logically identify opportunities through which that growth can occur. The absence of any allocations, windfall capacity or clearly defined delivery mechanisms means that the designation has no practical effect within the spatial strategy.
In technical planning terms this weakens the internal coherence of the Plan. The Development Plans Manual requires that the spatial strategy and settlement hierarchy operate as a clear and consistent framework guiding the distribution of development. Where a hierarchy identifies settlements as sustainable locations for growth but the Plan subsequently provides no mechanism for that growth to occur, the hierarchy risks becoming descriptive rather than operational.
In the case of Culverhouse Cross, the RLDP acknowledges the settlement's role within the hierarchy but does not translate that role into spatial planning outcomes. The settlement was identified as a Primary Settlement largely due to its functional role as a significant retail, employment and transport hub, together with the recent residential redevelopment of the former ITV studios which has increased its residential function. Whilst the Council appears to treat this redevelopment as a one-off brownfield opportunity that does not justify further greenfield growth, the reality is that the decision to redevelop the site for housing rather than employment has established the principle that residential development is appropriate in this location. When considered alongside the settlement’s designation as a Primary Settlement, this demonstrates that the Council itself has already accepted the sustainability of residential growth at Culverhouse Cross. Despite these characteristics, the allocation strategy effectively treats Culverhouse Cross as if it were a settlement where growth is not supported, thereby failing to reflect the very factors that justified its elevation within the settlement hierarchy.
The complete absence of housing allocations at Culverhouse Cross therefore undermines the credibility of the hierarchy and creates an incoherent spatial strategy, particularly where other settlements within the same tier of the hierarchy are expected to accommodate growth. Applying unequal weight to settlements within the same settlement category introduces inconsistency into the spatial strategy and raises concerns regarding the overall soundness of the Plan.
2.2 Consequences of the Current Approach
The failure to allocate development in Culverhouse Cross has several important consequences for the effectiveness of the Plan.
• Unmet Local Housing Need – Local affordable housing needs within the Wenvoe ward are not addressed within the spatial distribution of development. The RLDP therefore fails to demonstrate how identified housing need within this part of the authority will be met.
• Ineffective Settlement Hierarchy – The settlement hierarchy fails to operate as a meaningful spatial planning tool. If Primary Settlements are not expected to accommodate any development, the distinction between settlement tiers becomes blurred and the hierarchy ceases to function as a mechanism for directing growth.
• Displacement of Development Pressure – Housing demand associated with the eastern Vale is displaced to other settlements rather than being distributed across the settlement network in accordance with the hierarchy. This results in an imbalanced spatial strategy.
• Loss of Sustainable Small-Scale Opportunities – Opportunities for small-scale affordable housing delivery in locations close to employment, services and public transport are lost. This is particularly relevant in the case of Culverhouse Cross which functions as a significant employment and retail centre.
• Policy Mechanisms That Cannot Operate – The Plan relies on affordable housing exception mechanisms to deliver housing within settlements such as Culverhouse Cross. However, the extent of Green Wedge designation means that these mechanisms cannot realistically function without explicit clarification within the Plan.
Taken together these issues demonstrate that the current spatial strategy does not fully respond to the functional role of Culverhouse Cross within the settlement hierarchy and results in a distribution of development that is neither balanced

nor responsive to local housing needs.
3. Affordable Housing Need and Delivery
3.1 Evidence of Need
The Council's own housing evidence demonstrates a substantial requirement for affordable housing across the Vale of Glamorgan, including within rural settlements and the Wenvoe housing market area. The Local Housing Market Assessment identifies a significant backlog of need together with an ongoing annual requirement for additional affordable homes throughout the plan period. Whilst Welsh Government has queried the justification for elevating Culverhouse Cross to Primary Settlement status during the plan preparation process, the available evidence demonstrates that the settlement performs a clear functional role within the eastern Vale. In particular, the settlement benefits from strong bus connectivity to Cardiff and Barry together with established cycle and active travel links, and it sits within a ward where unmet affordable housing need has been clearly identified. When these factors are considered together, they reinforce the rationale for recognising Culverhouse Cross as a sustainable location capable of accommodating proportionate residential growth. This evidence confirms that the need for affordable housing is not confined to the authority's largest settlements but exists across the wider settlement network, including rural wards.
Affordable housing need is particularly acute for smaller one to three bedroom homes, reflecting the changing composition of households and the prevalence of single person and smaller family households. Waiting list data demonstrates significant unmet demand across the authority, particularly for social rented and intermediate homes that are accessible to lower and middle income households.
Within the Wenvoe ward specifically, housing register data identifies a clear need for affordable housing that cannot currently be met through existing supply. This indicates that households with a local connection to the area are unable to access suitable housing within their own community and must either remain in unsuitable accommodation or relocate to other settlements.
Despite this evidence, the RLDP does not allocate any sites capable of delivering affordable housing within Culverhouse Cross or Wenvoe. The absence of allocations means that the Plan does not clearly demonstrate how identified affordable housing needs arising within this part of the authority will be addressed. In spatial planning terms this raises concerns regarding the effectiveness of the Plan, as development plans are expected to respond directly to evidenced housing need and ensure that opportunities for affordable housing delivery are distributed across the settlement hierarchy rather than concentrated solely within a limited number of locations.
3.2 Role of Affordable Housing in the RLDP
The RLDP identifies a requirement to deliver a significant number of affordable homes during the plan period in order to respond to the substantial backlog of need identified within the Local Housing Market Assessment. In practice the Plan relies upon several delivery mechanisms to achieve this target, including:
• Affordable housing contributions secured through Section 106 agreements on market housing sites • Affordable housing-led allocations delivering a minimum proportion of affordable homes • Affordable housing exception sites outside settlement boundaries • Windfall development opportunities that may arise during the plan period
For the overall strategy to be effective, these mechanisms must operate across the settlement hierarchy so that affordable housing delivery is not overly concentrated in a small number of locations. However, in the case of Culverhouse Cross none of these mechanisms realistically provide delivery opportunities. There are no allocated housing sites within the settlement capable of generating affordable housing contributions, no affordable housing-led allocations within the settlement boundary, and the extensive Green Wedge designation surrounding the settlement significantly constrains the realistic operation of the affordable housing exception site policy. In practical terms this means that, despite clear evidence of unmet affordable housing need within the Wenvoe ward, the RLDP does not identify any credible mechanism through which that need could be addressed locally. This further reinforces the conclusion that the spatial strategy fails to respond effectively to evidenced housing need in this part of the authority.
4. Policy HG4 and HG5 – Practical Deliverability
4.1 Affordable Housing Led Sites (HG4)
Policy HG4 identifies affordable housing-led allocations delivering a minimum of 50% affordable housing.
However these sites are located within settlement boundaries.
At Culverhouse Cross there are no available sites within the settlement boundary capable of delivering such schemes.
As a result HG4 cannot operate as an effective delivery mechanism in this settlement.
4.2 Affordable Housing Exception Sites (HG5)
Policy HG5 allows small-scale affordable housing exception sites outside settlement boundaries where a clear local need is demonstrated.
Culverhouse Cross is specifically identified as a settlement where exception sites may be appropriate.
However the majority of land surrounding the settlement is designated as Green Wedge.
The RLDP does not clearly explain how Policy HG5 should operate where land is also designated as Green Wedge.
This creates a policy ambiguity.
If Green Wedge policy prevents the operation of HG5 entirely, then the policy mechanism identified by the Council for delivering affordable housing in these settlements cannot realistically function.
If HG5 is intended to operate within Green Wedges where the strategic function of the designation is not harmed, then the Plan should make this clear.
Without this clarification the Plan risks creating theoretical delivery mechanisms that cannot be implemented in practice.
5. Green Wedge Considerations
5.1 Purpose of Green Wedges
Green Wedge designations are local planning policy tools used to manage the form of settlements and prevent inappropriate expansion of built development into open countryside. Planning Policy Wales explains that Green Wedges perform a similar function to Green Belts at a local level and are primarily intended to protect the spatial separation between settlements and maintain the distinction between urban areas and the countryside.

Green Wedges are typically designated where there is demonstrable development pressure and where reliance solely on settlement boundaries would not be sufficient to maintain the desired urban form. Their purpose is therefore strategic rather than absolute: they are intended to guide the form and direction of development rather than impose a blanket prohibition on all development.
National policy identifies five principal purposes for Green Wedges:
• Preventing the coalescence of large towns or cities with neighbouring settlements. • Managing urban form through controlled expansion of urban areas. • Assisting in safeguarding the countryside from encroachment. • Protecting the setting of urban areas. • Assisting urban regeneration by encouraging the recycling of urban land.
Planning Policy Wales also makes clear that Green Wedges should be reviewed as part of the development plan process and should only be retained where there is a demonstrable need for their continued designation.
5.2 Evidence from the Green Wedge Assessment
The Council's own Green Wedge Background Paper (BP27) assesses the land surrounding Culverhouse Cross as part of Green Wedge MG18 (3) – North of Wenvoe. The study divides the designation into a number of parcels (NW1, NW2 and NW3) and assesses their contribution against the five Green Wedge purposes.
Importantly, the assessment demonstrates that land immediately adjoining the urban edge of Culverhouse Cross does not perform a uniformly strong Green Wedge function.
For example, Parcel NW1 – which lies adjacent to the commercial and highway infrastructure associated with Culverhouse Cross – is identified as making only a weak contribution to the purpose of preventing settlement coalescence and a weak contribution to protecting the setting of the urban area, with an overall contribution rating of Moderate.
Similarly, Parcel NW2 – which also lies adjacent to the settlement edge – is assessed as making only a moderate contribution to preventing settlement coalescence and managing urban form, while again making only a weak contribution to protecting the setting of the settlement.
The study explicitly notes that some parcels around Culverhouse Cross do not lie within a gap where coalescence between settlements would occur, and therefore make only a limited contribution to that purpose.
These findings are important because they demonstrate that the Green Wedge designation in this location performs a varied and nuanced role rather than representing land of uniformly high strategic importance.
5.3 Relationship of the Site to the Green Wedge
Candidate Site CS387 occupies a contained position immediately adjacent to the existing urban edge of Culverhouse Cross. In spatial terms the site sits within an area where the Green Wedge assessment identifies only a moderate contribution to the strategic purposes of the designation.
The Green Wedge study also recognises that the retail park, major highway infrastructure and recent residential development at the former ITV studios site exert an urbanising influence on the surrounding land.
Against this context, the development of a small and contained residential scheme adjacent to the settlement boundary would represent a logical rounding-off of the urban edge rather than a significant extension of built form into the wider countryside.
The proposal has been carefully designed to retain areas of open land and maintain visual openness across the wider Green Wedge. Landscape buffers and retained open areas would ensure that the remaining Green Wedge continues to fulfil its strategic function.
Importantly, the Green Wedge assessment itself acknowledges that the area around Culverhouse Cross experiences development pressure due to its relatively sustainable location on the western edge of Cardiff and its strong highway accessibility.
In this context, it is necessary for the development plan to strike a balance between protecting the strategic purposes of the Green Wedge and responding to identified housing needs. The limited and carefully contained development proposed at Candidate Site CS387 would achieve this balance by delivering much needed affordable housing while maintaining the wider strategic function of the Green Wedge.
5.4 Implications for the Spatial Strategy
Candidate Site CS387 occupies a contained position adjacent to the existing urban edge of Culverhouse Cross. Green Wedge in this location has been defined as performing a low function in terms of preventing coalescence which is set out within the Councils' own Green Wedge study.
Development of the site would represent a logical rounding-off of the settlement rather than an incursion into open countryside.
The proposal has been carefully designed to retain areas of open land and maintain visual openness across the wider Green Wedge.
The development would therefore not undermine the strategic objective of preventing coalescence between Culverhouse Cross and Cardiff.
6. Sustainability of Culverhouse Cross
6.1 Functional Sustainability
Culverhouse Cross functions as a significant employment, retail and service centre within the eastern Vale of Glamorgan and forms one of the principal commercial hubs on the western edge of Cardiff. Although the settlement has historically been characterised primarily by commercial uses, recent residential development has strengthened its role as a mixed-use location where people can live, work and access services within close proximity.
The settlement benefits from a number of key sustainability characteristics which support its role within the settlement hierarchy, including:
• Major retail and employment areas including the Valegate and Culverhouse Cross retail parks which provide a substantial range of jobs and services. • Frequent bus services linking the settlement with Cardiff, Barry and surrounding communities. • Access to established active travel routes connecting the settlement with nearby residential areas and employment locations. • Immediate proximity to strategic highway infrastructure including the A48 and A4232, providing

direct connectivity to Cardiff and the wider regional road network.
Taken together, these characteristics mean that Culverhouse Cross operates as a highly accessible location where residents are able to access employment, retail and service opportunities within walking distance or via short public transport journeys. The presence of significant employment uses within the settlement further reduces the need for long-distance commuting and supports the creation of a more self-contained and sustainable community.
Importantly, sustainability within national planning policy is not defined solely by the presence of rail infrastructure but rather by the ability of residents to access services, employment and facilities through a range of transport modes. In this respect Culverhouse Cross performs strongly due to the combination of employment opportunities, public transport connectivity and proximity to Cardiff.
6.2 Alignment with National Policy
National planning policy promotes development in locations where people are able to access jobs, services and community facilities without the need for excessive travel. Planning Policy Wales in particular emphasises the importance of locating new housing in places that support sustainable placemaking outcomes and reduce reliance on private car travel.
Culverhouse Cross clearly meets these criteria. The settlement provides immediate access to employment, retail, healthcare and service facilities together with strong public transport connections into Cardiff and other nearby settlements. This level of accessibility is entirely consistent with the principles of sustainable development promoted through national planning policy.
The absence of a rail station does not in itself render a location unsustainable. Many settlements across Wales function successfully as sustainable communities without direct rail connectivity where other transport options and local services are available.
An approach to spatial planning which places disproportionate emphasis on rail-based settlements risks overlooking locations such as Culverhouse Cross which already function as important employment and service centres within the wider settlement network. A transport strategy focused solely on rail connectivity fails to recognise the role of bus services, active travel and proximity to employment in supporting sustainable communities.
7. Site Suitability and Deliverability
7.1 Deliverability
The site is available, viable and capable of being delivered within the early years of the Plan period. Importantly, the site does not rely on complex land assembly, strategic infrastructure investment or long lead-in times that often delay the delivery of larger strategic allocations.
Key deliverability characteristics include:
• Single land ownership – The site is controlled by a single, motivated landowner working in partnership with an experienced land promoter. This removes the risk of fragmented ownership which can frequently delay the delivery of allocated sites.
• No abnormal infrastructure requirements – The site does not require strategic highway works, major utility diversions or significant ground remediation. Development can therefore proceed without the need for substantial upfront infrastructure investment.
• Existing access arrangements – The site benefits from an established access point which currently serves the lawful dog-walking business operating on the land. This demonstrates that the site already functions as an accessible and serviced parcel of land and reduces the complexity of future development.
• Demonstrated viability – Preliminary development appraisal work indicates that the site can support a scheme delivering approximately 50 dwellings including a minimum of 50% affordable housing while remaining financially viable. This reflects realistic build costs and values within the local housing market.
Taken together, these factors demonstrate that the site represents a deliverable short-term opportunity capable of contributing to the Council's housing supply early in the plan period. This is particularly important given the well-recognised need for development plans to allocate sites that can deliver housing quickly rather than relying solely on longer-term strategic sites.
7.2 Development Capacity
The proposed site could deliver approximately 50 dwellings, including a minimum of 50% affordable housing, in accordance with the objectives of Policy HG4 and the wider affordable housing strategy within the RLDP.
This scale of development has been carefully considered to ensure that it reflects the role of Culverhouse Cross within the settlement hierarchy while remaining proportionate to the size and character of the settlement. As a Primary Settlement outside the Strategic Growth Area, Culverhouse Cross is identified as a location capable of accommodating limited but meaningful levels of growth that support local housing needs.
A scheme of around 50 homes represents an appropriate and sustainable level of development which would:
• Provide a meaningful contribution towards meeting local affordable housing need within the Wenvoe ward. • Integrate effectively with the existing built form at the edge of Culverhouse Cross. • Avoid the need for large-scale urban expansion or major infrastructure investment. • Maintain the wider strategic function of the surrounding Green Wedge through a contained and well-designed development footprint.
Importantly, the proposed capacity reflects a small-scale extension to the existing settlement, rather than a strategic urban expansion. This approach aligns with the spatial strategy for Primary Settlements outside the Strategic Growth Area, where proportionate growth is expected to occur through modest and deliverable sites capable of meeting local needs.
The proposed allocation would therefore represent a logical and sustainable opportunity for residential development that complements the role of Culverhouse Cross within the settlement hierarchy while supporting the delivery of much-needed affordable housing.
8. Soundness of the RLDP
For a development plan to be considered sound it must satisfy the key tests set out within the Development Plans

Manual and national planning policy. In summary, a sound plan must be:
• Justified – founded on a robust and credible evidence base and representing the most appropriate strategy when considered against reasonable alternatives. • Effective – deliverable over the plan period with clear and realistic mechanisms for implementation. • Consistent with national policy – aligned with the principles and objectives of Planning Policy Wales and the wider framework for sustainable placemaking.
The current RLDP approach to Culverhouse Cross raises significant concerns in relation to each of these tests.
Justified
The Plan identifies Culverhouse Cross as a Primary Settlement outside the Strategic Growth Area, recognising its accessibility, employment function and role within the wider settlement network. However, despite this designation, the RLDP allocates no housing growth whatsoever within the settlement.
This creates a clear disconnect between the evidence underpinning the settlement hierarchy and the spatial strategy that flows from it. If the evidence base demonstrates that Culverhouse Cross is sufficiently sustainable to be classified as a Primary Settlement, it logically follows that the Plan should provide opportunities for proportionate residential growth within or adjoining the settlement.
The absence of any allocations therefore raises questions as to whether the spatial strategy represents the most appropriate approach when considered against reasonable alternatives. In particular, the Plan does not adequately explain why modest growth opportunities adjacent to the settlement boundary – such as the proposed allocation of Candidate Site CS387 – have been discounted despite their potential to deliver significant levels of affordable housing.
Effective
A development plan must demonstrate that its strategy can be realistically delivered over the plan period. In this case the RLDP relies heavily on a number of policy mechanisms to deliver affordable housing, including market-led allocations, affordable housing-led sites and rural exception sites.
However, these mechanisms are not capable of operating effectively within Culverhouse Cross. There are no allocated sites within the settlement capable of generating affordable housing contributions, no affordable housing-led allocations within the settlement boundary, and the extensive Green Wedge designation surrounding the settlement severely restricts the realistic operation of affordable housing exception sites.
As a result, although the Plan identifies a clear need for affordable housing within the Wenvoe ward, it fails to identify any credible delivery mechanism through which that need could be addressed locally. This creates a clear risk that the Plan will not deliver the spatial distribution of affordable housing that its evidence base identifies as necessary.
Consistent with National Policy
Planning Policy Wales places strong emphasis on sustainable placemaking and the creation of communities where people are able to access employment, services and facilities without the need for excessive travel. National policy also promotes the efficient use of land and encourages development in locations that already benefit from strong transport connections and established infrastructure.
Culverhouse Cross performs strongly against these principles. The settlement functions as a major retail and employment hub on the western edge of Cardiff and benefits from frequent bus services, active travel links and immediate access to strategic road infrastructure.
The spatial strategy set out in the RLDP does not fully reflect these placemaking principles. By directing growth away from Culverhouse Cross despite its accessibility and service base, the Plan risks overlooking opportunities to deliver sustainable residential development in locations where people can live close to employment and services.
Taken together, these issues demonstrate that the current strategy for Culverhouse Cross is not fully justified by the evidence, cannot be shown to operate effectively in practice, and does not fully reflect the wider objectives of national planning policy. The allocation of Candidate Site CS387 would provide a practical and proportionate means of addressing these shortcomings while supporting the delivery of affordable housing within a sustainable settlement location.
9. Proposed Modification
To address the issues identified throughout this representation it is recommended that the RLDP be modified to allocate Candidate Site CS387, Land at Culverhouse Cross, for residential development. The allocation would represent a modest and proportionate extension to the existing settlement boundary and would provide a practical mechanism through which the Plan could respond to clearly identified affordable housing needs within the Wenvoe ward.
The modification would ensure that the spatial strategy properly reflects the role of Culverhouse Cross within the settlement hierarchy while maintaining the strategic purposes of the surrounding Green Wedge designation.
The allocation should provide for:
• Up to 50 dwellings delivered as a carefully planned settlement edge scheme which integrates with the existing built form at Culverhouse Cross.
• A minimum of 50% affordable housing, ensuring that the development makes a meaningful contribution towards meeting the substantial backlog of affordable housing need identified within the Local Housing Market Assessment and the housing register for the Wenvoe ward.
• Landscape buffers and retained open space, designed to maintain visual openness and ensure that the remaining Green Wedge continues to fulfil its strategic function in preventing the coalescence of settlements.
Incorporating this allocation within the RLDP would enable the Plan to:
• Address locally evidenced housing need by providing an opportunity to deliver affordable homes within the community where demand has been identified.
• Support the role of Culverhouse Cross as a Primary Settlement by allowing proportionate residential growth that reflects the settlement's accessibility, employment base and transport connectivity.
• Deliver affordable housing in a sustainable location, close to employment areas, retail services and public transport routes.
• Provide a deliverable short-term housing site capable of contributing to housing supply early in the plan period.

• Maintain the strategic function of the Green Wedge by focusing development on a contained parcel of land adjacent to the urban edge while retaining substantial areas of open land.
• Improve the effectiveness and soundness of the RLDP by ensuring that the spatial strategy properly aligns with the settlement hierarchy and that credible delivery mechanisms exist for affordable housing within this part of the authority.
Alternative Policy Approach
In the event that the Council is not minded to allocate Candidate Site CS387, an alternative and equally effective modification would be to introduce a policy mechanism that allows affordable housing-led windfall sites within Primary Settlements located in Green Wedge designations, where it can be clearly demonstrated that development would not undermine the strategic purpose of the Green Wedge.
Such a policy could allow modest residential schemes where:
• the development is affordable housing-led, providing a significant proportion of affordable homes; • the site is adjacent to the existing settlement boundary and represents a logical rounding-off of the urban edge; • it can be demonstrated that the development would not result in unacceptable coalescence between settlements; • the scheme retains sufficient open land and landscape buffers to maintain the wider openness of the Green Wedge.
Introducing such a mechanism would provide a practical means of ensuring that affordable housing needs in settlements such as Culverhouse Cross can be addressed without undermining the strategic purpose of the Green Wedge designation. It would also resolve the current policy ambiguity whereby the Plan identifies settlements such as Culverhouse Cross as suitable locations for affordable housing exception sites but does not clearly explain how such sites can come forward where surrounding land lies within the Green Wedge.
This approach would therefore improve the effectiveness, flexibility and soundness of the RLDP by ensuring that affordable housing delivery mechanisms can operate in practice across the full settlement hierarchy.
10. Conclusion
Culverhouse Cross represents a sustainable and appropriate location for small-scale residential growth when considered against the evidence base underpinning the RLDP and the wider objectives of national planning policy. The settlement functions as an established employment, retail and service hub on the western edge of Cardiff and benefits from strong public transport connections, active travel links and direct access to strategic highway infrastructure. These characteristics have already been recognised through the Council's decision to designate Culverhouse Cross as a Primary Settlement within the settlement hierarchy.
Despite this designation, the RLDP does not allocate any housing within the settlement and does not identify any credible mechanism through which locally arising housing needs can be addressed. This creates a clear inconsistency within the spatial strategy. A settlement which is recognised as sustainable and capable of accommodating proportionate levels of development cannot logically be treated as a location where no growth is expected to occur.
The absence of allocations also prevents the delivery of much-needed affordable housing within the Wenvoe ward, where the Council's own evidence identifies a clear and persistent backlog of need. Without opportunities for development within or adjoining Culverhouse Cross, households with a local connection to the area are likely to be displaced to other settlements, undermining the objective of creating balanced and inclusive communities across the Vale of Glamorgan.
Candidate Site CS387 provides a deliverable and policy-compliant opportunity to address this issue. The site represents a modest and contained extension to the existing settlement boundary and is capable of delivering approximately 50 dwellings including a minimum of 50% affordable housing. The proposal has been carefully designed to integrate with the existing built form, maintain the wider function of the surrounding Green Wedge and provide a meaningful contribution towards meeting local housing needs.
Allocating the site would therefore provide a practical and proportionate means of improving the effectiveness of the RLDP. It would ensure that the spatial strategy properly reflects the role of Culverhouse Cross within the settlement hierarchy, provide a credible mechanism for delivering affordable housing within this part of the authority and support sustainable placemaking in accordance with national planning policy.
For these reasons it is considered that Candidate Site CS387 should be allocated within the RLDP. Doing so would help ensure that the Plan provides a coherent, deliverable and policy-compliant framework for guiding development across the Vale of Glamorgan over the plan period.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/35v

6701 Object

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Persimmon Homes (East Wales) [1068]
Agent: Asbri Planning

Summary:

Overall Growth Levels (Policy SP6)

It is acknowledged that the preferred growth option (dwelling-led 10 Year scenario), upon which the RLDP housing requirement figure is based, reflects what has been delivered in the Authority in recent years, and is considered by the Authority to be realistic and suitably ambitious given the Vale's position within the National Growth Area. However, as a general comment, it is considered that targeting a higher/more ambitious growth rate would be appropriate.

In reviewing the most recent LDP Annual Monitoring Report (Vale of Glamorgan LDP 2011-2026, 7th Annual Monitoring Report, 1st April 202431st March 2025) (published October 2025), it is clear that there is a shortfall in housing delivery in the Vale of Glamorgan. It is stated that: "Between 1st April 2011 and 1st April 2025, a total of 6,999 dwellings were completed within the Vale of Glamorgan of which 4,641 units were general market dwellings against the 2025 AMR target of 6,387 that should have been developed at this point in the plan period, in accordance with the target. The number of additional general market dwellings delivered is 27.3% below the monitoring target". In light of the fact that there is a significant shortfall in housing delivery (i.e.
currently 27.3% lower than the LDP target), it is considered that a higher growth level for the Replacement Plan period would assist in rectifying under-delivery, allowing for housing completions to be better aligned with evidence of need (rather than repeating past shortfalls).

On February 12th 2026, the Welsh Government published updated estimates of additional housing need in Wales. The figures replace the 2019-based estimates and draw on the latest available data, including the 2022-based household projections published in late 2025. In summary, Welsh Government identify that there is a current estimated existing unmet need of 9,400 housing units. Estimates of existing unmet need have increased by 64% since the 2019-based estimates, due to a rise in homeless households in temporary accommodation.

In terms of future housing need, on average, between 7,800 and 9,300 additional housing units are estimated to be needed annually over the five-year period from July 2025 to June 2030, with a central estimate of 8,700 from newly arising need. The estimated newly arising need for July 2025 to June 2030 is higher than in the 2019-based estimates. This increase reflects higher projected household growth in the 2022-based household projections compared with the 2018-based projections used previously.

The Authority will need to give detailed consideration to the implications of the updated estimates of housing need. As the most up to date projections, the Replacement LDP must properly account for the new dataset to ensure soundness of the plan. In this regard, it is stated at Paragraph 5.34 of the Development Plans Manual that "In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government population and Household Projections are a fundamental
part of the evidence base." Accordingly, Paragraph 5.35 goes on to state that "All LPAs should use these projections and the resultant household numbers when considering the level of housing provision for a plan period".

In light of the February 2026 publication of updated estimates of housing need in Wales (which indicate
a substantial increase in both existing unmet housing need and newly arising need), and in the context of the existing under-delivery of units evidenced within the most recent LDP AMR (i.e. which identifies a shortfall in housing delivery of 27.3% on the adopted LDP target), it is considered essential that the overall growth levels for the Replacement Plan are revisited (and increased accordingly).

Full text:

We write specifically with regard to the Key Site at 'North West Barry' (Policy SP4: KS1). As the Authority
are aware, a significant amount of supporting information has been prepared in relation to the Key Site over the course of the preparation of the Replacement LDP to date – this detailed evidence has clearly demonstrated that the inclusion of 'North West Barry' as a Key Site with the Replacement Plan fully accords with the Replacement LDP strategy. Furthermore, the detailed submissions have evidenced that the site is entirely deliverable and viable.

In summary, this representation sets out support for the inclusion of Land at North West Barry as a Key Site within the Replacement LDP. Our Client (Persimmon Homes) is fully committed to the delivery of the allocation, in accordance with the policies of the Replacement Plan (both site-specific and plan-wide policies inclusive).

We would highlight that although the representation provides overarching support for the Deposit Plan
(and the inclusion of North West Barry as a Key Site), a number of detailed objections are submitted in relation to specific elements of the proposed wording of the Key Site policy (HG1: KS1). In addition, the wider policies of the Deposit Plan have been reviewed in detail and comments are submitted accordingly.

Background
By way of background context, as the Authority are aware, a Candidate Site representation was submitted on behalf of Persimmon Homes in relation to Land at Weycock Cross, Barry, at the Stage 1 Call for Sites in September 2022 (Site Ref. 449). The land (circa 7 hectares) was put forward for inclusion in the Replacement LDP for a housing allocation (for circa 180 units). Within the Replacement LDP Preferred Strategy (published November 2023), the Candidate Site at Weycock Cross was not identified as a Key Site, in light of the preferred allocation of 1,500 units at land at North East Barry. Further to issues arising in relation to the deliverability of the North East Barry Key Site, the Authority subsequently

consulted on alternative options for the provision of sufficient housing land within Barry, with the Candidate Site at Weycock Cross ('North West Barry') identified as capable of delivering 376 units (as taken forward within the Deposit Plan). A significant degree of supporting survey and assessment work has been prepared in relation to the North West Barry Key Site which serves to demonstrate that the site (at a capacity of 376 units) presents a sustainable, deliverable and viable allocation, capable of accordance with national sustainable placemaking outcomes.

Sustainable Growth Strategy (Policy SP1)
The Deposit Plan's overarching strategy in relation to sustainable growth is supported. The primary focus of concentrating housing growth within the 'Strategic Growth Area' (i.e. where the main centres of population are accommodated, and which are served by a range of facilities and services, and are accessible by a range of transport modes) as outlined by Policy SP1 is considered appropriate and will allow for the delivery of sustainable and resilient communities. As per previous representations
submitted by Asbri Planning on behalf of Persimmon Homes in relation to the RLDP Preferred Strategy,
the prior identification of the strategic-scale (1,500 unit) Key Site at North East Barry was considered to represent an over-reliance on one site to meet the housing demand of the Authority's Key Settlement (with associated constraints in relation to the delivery of units on a strategic-scale site within the earlymid part of the plan period). It is considered that the inclusion of North West Barry as a Key Site, supplemented by a number of smaller housing allocations as identified in Policy HG1, will ensure that the housing requirement for the Barry can be met in a robust and deliverable manner.

Overall Growth Levels (Policy SP6)
It is acknowledged that the preferred growth option (dwelling-led 10 Year scenario), upon which the
RLDP housing requirement figure is based, reflects what has been delivered in the Authority in recent years, and is considered by the Authority to be realistic and suitably ambitious given the Vale's position within the National Growth Area. However, as a general comment, it is considered that targeting a higher/more ambitious growth rate would be appropriate. In reviewing the most recent LDP Annual Monitoring Report (Vale of Glamorgan LDP 2011-2026, 7th Annual Monitoring Report, 1st April 2024
31st March 2025) (published October 2025), it is clear that there is a shortfall in housing delivery in the Vale of Glamorgan. It is stated that: "Between 1st April 2011 and 1st April 2025, a total of 6,999 dwellings were completed within the Vale of Glamorgan of which 4,641 units were general market dwellings against the 2025 AMR target of 6,387 that should have been developed at this point in the plan period, in accordance with the target. The number of additional general market dwellings delivered is 27.3% below the monitoring target".

In light of the fact that there is a significant shortfall in housing delivery (i.e. currently 27.3% lower than the LDP target), it is considered that a higher growth level for the
Replacement Plan period would assist in rectifying under-delivery, allowing for housing completions to be better aligned with evidence of need (rather than repeating past shortfalls).

On February 12th 2026, the Welsh Government published updated estimates of additional housing need in Wales. The figures replace the 2019-based estimates and draw on the latest available data, including the 2022-based household projections published in late 2025. In summary, Welsh Government identify that there is a current estimated existing unmet need of 9,400 housing units. Estimates of existing unmet need have increased by 64% since the 2019-based estimates, due to a rise in homeless households in temporary accommodation.

In terms of future housing need, on average, between 7,800 and 9,300 additional housing units are estimated to be needed annually over the five-year period from July 2025 to June 2030, with a central estimate of 8,700 from newly arising need. The estimated newly arising need for July 2025 to June 2030 is higher than in the 2019-based estimates. This increase reflects higher projected household growth in the 2022-based household projections compared with the 2018-based projections used previously. The Authority will need to give detailed consideration to the implications of the updated estimates of housing need. As the most up to date projections, the Replacement LDP must properly account for the
new dataset to ensure soundness of the plan. In this regard, it is stated at Paragraph 5.34 of the Development Plans Manual that "In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base."

Accordingly, Paragraph 5.35 goes on to state that "All LPAs should use these projections and the resultant household numbers when considering the level of housing provision for a plan period".

In light of the February 2026 publication of updated estimates of housing need in Wales (which indicate
a substantial increase in both existing unmet housing need and newly arising need), and in the context of the existing under-delivery of units evidenced within the most recent LDP AMR (i.e. which identifies a shortfall in housing delivery of 27.3% on the adopted LDP target), it is considered essential that the overall growth levels for the Replacement Plan are revisited (and increased accordingly).

Policy HG1 KS1 – Land at North West Barry
Overall Support for Allocation

The detailed supporting information prepared on behalf of Persimmon Homes in relation to the Land at North West Barry site to date, including the masterplanning work undertaken in liaison with the Local Authority and their statutory

consultees, has demonstrated that a sustainable, high-quality residential development which responds sensitively to both local character and landscape setting can be delivered on the site. It is considered that the allocation of Land at North West Barry (KS1) represents an entirely suitable housing allocation, which has been evidenced as being both viable and deliverable. The
inclusion of KS1 as a housing allocation in the Deposit Plan is therefore welcomed and supported.

Policy HG1 KS1 - Detailed Wording - Objections As stated, although the representations provide overarching support for the Deposit Plan and the inclusion of Land at North West Barry as an allocation, a number of detailed matters are objected to in relation to specific elements of the proposed KS1 policy wording.

It is acknowledged that the Key Site will need to be delivered in accordance with placemaking principles
(as set out in Policy SP4 Placemaking and Policy PGD1 Creating Well Designed Places), and masterplanning work to date has demonstrated that the site is fully capable for compliance with both Policy SP4 and PGD1.

Comments are provided on the additional requirements which the site is anticipated to comply with as set out at Policy HG1 KS1. Revised wording where required is identified in red.

• The provision of a minimum of 113 affordable housing units (30%) with a unit mix reflecting the requirements of the latest Local Housing Market Assessment and the Council's waiting list data.

In order to deliver a greater social mix, the affordable units should be dispersed across the site in clusters of no more than 10 units, The positioning of the affordable units will be informed by the experience and best-practice of the Registered Social Landlord responsible for the delivery and ongoing management of the units, with their delivery being phased across the development trajectory.

The policy as currently worded is considered to be overly prescriptive with regards to the positioning of affordable units on the site. It is the case the Registered Social Landlord who is responsible for the delivery and ongoing operation/management of the affordable units is best-placed to advise upon the positioning of the affordable units within the site layout. As such, it is requested that the prescriptive nature of the above bullet point is mended to allow for the RSL to advise on best practice.

• Provision of land across the site frontage to allow for the widening of the A4226 Port Road West and the delivery of an Active Travel route across the frontage of the site as part of the Weycock Cross to Cardiff Airport Active Travel route, as identified in Policy TR1 (relating specifically to the delivery of the section of the Active Travel route adjoining the northern boundary of the Key Site only).

• Creation of a new signalised junction on to the A4226 Port Road West, which will need to accommodate controlled pedestrian/cycle crossing facilities.

With regards to the first two bullet points set out under the 'Sustainable Transport and Highways' section of the Policy HG1 KS1 (copied above), to confirm, as part of the development of the Key Site, it is proposed (as detailed within the submitted Transport Assessment) to construct a new junction from Port Road to the west of the Weycock Cross roundabout at the location of the existing field gated access in the form of a signal-controlled junction, which would allow for the safe and timely exit of traffic from
the development onto the local highway network. Such an access would also provide enhanced Active Travel infrastructure in conjunction with the proposed Active Travel route between the Weycock Cross junction and Cardiff Airport. Traffic signals at the proposed site access would provide for dedicated demand dependent green time for pedestrians and cyclists along this section of the A4226 Port Road.

Significant work has been undertaken to date in demonstrating that the above is deliverable. However,
it is requested that further clarification is included within the policy text to confirm that the Key Site is not responsible for the delivery of any further/additional sections of the Weycock Cross to Cardiff Airport Active Travel route, over and above the section of the route which adjoins the Key Site.

Suggested additional text is outlined in red above.
• A proportionate contribution towards off-site improvements to the capacity and flow of Weycock Cross roundabout and other junctions on the strategic highways network where necessary (in the context of the impact of wider committed developments on the strategic highway network).

As set out within the Transport Assessment (May 2025) prepared in support of the Key Site, the traffic movements associated with the North West Barry allocation could be accommodated on the highway network with a marginal and inconsequential impact on the conditions already experienced on the local highway network. An appraisal of the impact of committed development (as agreed with the Highways Authority) has been undertaken as part of the Transport Assessment, which identifies that committed
development within the vicinity of the Weycock Cross junction would have a greater impact upon the local highway network than the North West Barry Key Site. The North West Barry development is smaller in comparison to the other committed development assessed, and would have a marginal and inconsequential impact upon the operation of the Weycock Cross junction. It is therefore considered that the policy wording should be amended to reflect the

'proportionate' nature of contributions required.

Suggested additional text is outlined in red above.
• A contribution towards off-site sustainable transport measures in the area (as necessary and related to the Key Site).

Further clarification is required in regards to the above bullet point. It will be important to ensure that any off-site measures are directly related to the proposed development, and are necessary to ensure the acceptability of the proposed development. The requirement for a contribution towards off-site measures 'in the area' is not specific enough, and it is requested that the wording is amended as per the suggested text outlined in red above.

• The provision of a key area of open space (minimum 2.3 ha) to the south of the site adjoining Porthkerry Country Park which will serve as a buffer to the adjoining SINC at Mill Wood and offer opportunities for significant iodiversity enhancements. The ownership of this area should be
transferred to the Vale of Glamorgan Council, together with an appropriate financial contribution, for management as part of Porthkerry Country Park.

It is considered that the inclusion of a specified figure for the area of open space to be provided within the southern section of the site is unnecessary within the policy text.

The Indicative Plan for the Key Site included at Figure 13 of the Deposit Plan illustrates the indicative extent of 'Significant Open Space' to be provided adjoining Porthkerry Country Park, which will be subject to further detailed masterplanning work as the Planning Application is prepared in due course. A figure for the exact area
of open space to be provided within this section of the site cannot therefore be robustly specified until the further stages of masterplanning work are completed. As such, it is requested that the figure is removed from the policy text, with the identification of 'Significant Open Space' on Indicative Plan being considered satisfactory.

Furthermore, it is not considered appropriate that the policy wording should refer specifically to the financial contribution towards the management of this land, in addition to its transfer, as such contributions will be subject to detailed viability appraisal work at the Planning Application stage.

Deposit Plan Appendix 1 - Housing Trajectory
The identified delivery timescales and quantum of units for the site as set out at Appendix 1 of the Deposit Plan (as copied below) are agreed with and considered to be suitable/deliverable:

2028-2029: 30 units
2029-2030: 60 units
2030-2031: 60 units
2031-2032: 60 units
2032-2033: 60 units
2033-2034: 60 units
2034-2035: 46 units

Persimmon Homes are committed to the delivery of the allocation, in accordance with the phasing trajectory outlined in the Deposit Plan. Further to the detailed submissions previously made, including extensive viability evidence which has been discussed in detail with the Local Authority and their viability consultant, it is confirmed that the site is viable and deliverable in accordance with the identified delivery timescales. It should be noted that there is a possibility that the number of units to be delivered within the first year (2028-2029) could be increased slightly, however, it is considered that the above presents a realistic trajectory for the site.

Deposit Plan Appendix 2 – Infrastructure Delivery Plan
A number of amendments to the text are requested in regard to the infrastructure requirements for KS1 North West Barry as set out within the Infrastructure Delivery Plan at Appendix 2 of the Deposit LDP.

Within the 'Key site issues and constraints' section of the Infrastructure Requirements table, the following amendments to the text are considered necessary:

• Proportionate access and junction arrangements on to the A4226 and a financial contribution towards strategic highway network enhancements (in the context of the impact of wider committed developments on the strategic highway network).

As set out above, it is important that the required financial contribution towards strategic highway network enhancements is proportionate to the scale of the North West Barry development, and that additional committed developments, which would have a greater impact on the strategic highway network, are considered in the round.

• Previous desk-based assessment and site visits dentified that development would have a major impact on five features (?), including important hedgerows which form historic boundaries. Archaeological features were also identified.

The above bullet point requires clarification as to the 'five features' which the development would have a 'major impact'

upon. It should be noted that masterplanning work to date has been informed by extensive survey and assessment work which ensures that the proposed development is capable of addressing all constraints.

Within the section of the table where 'broad costs' of key infrastructure requirements are outlined, it is considered that the following amendments to the text are necessary:

• Education – Estimated Cost Circa £3,730,000 (£TBC)
It is considered that an estimated cost for education contributions cannot be specified at this stage, as the contribution will be directly related to current school capacity figures at the time of the Planning Application, with school capacities being fluid and subject to change. As such, the 'circa' figure should be removed from the text and replaced with 'TBC' at this point.

• A proportionate contribution towards on-site improvements to the capacity and flow of Weycock
Cross roundabout and other junctions on the strategic highways network where necessary (in the context of the impact of wider committed developments on the strategic highway network).

• VOGC to deliver improvements to junctions on the Strategic Highways Network using s106 contributions (from the North West Barry Key Site and other relevant commitments) . As set out above, it is important that the required financial contribution towards strategic highway
network enhancements is proportionate to the scale of the North West Barry development.

• Contribution towards off-site sustainable transport measures in the area as necessary and related
to the Key Site.

As per the wording contained within the policy text of HG1 KS1, the requirement for a contribution towards off-site measures 'in the area' is not specific enough to provide certainty for the developer, and it will be important to ensure that any off-site measures are necessary and directly related to the North West Barry development.

• Community Facilities – Estimated Cost Circa £665,000 (£TBC) It is considered that an estimated cost for community facility contributions cannot be specified at this
stage – no background calculations are provided to evidence that this estimate is robust. As such, the 'circa' figure should be removed from the text and replaced with 'TBC' at this point.

Policy CC1 – Residential Operational Net Zero Carbon Development

Persimmon Homes has significant concerns regarding Policy CC1 and objects to it on the basis that it replicates requirements already being progressed at a national level through Welsh Government's Future Homes Standard (FHS). The FHS is intended to deliver "zero carbon ready" homes via a unified Building Regulations framework, making additional local policy unnecessary. At present, Building Regulations Part L1A sets out the standards for energy efficiency in new dwellings, and Persimmon
already designs its homes to go beyond these minimum thresholds. This includes enhanced insulation and improved building fabric performance, with reduced U values for elements such as walls, roofs, floors and windows to minimise heat loss. As a result, our homes typically achieve strong Energy Performance Certificate (EPC) ratings, generally in the A–B categories. Introducing further operational net zero requirements at a local planning level risks adding cost, complexity and uncertainty, potentially affecting the viability and deliverability of housing sites. The Development Plans Manual for Wales is clear that local plans should not repeat national policy or seek to regulate matters already addressed through other statutory regimes.

On that basis, Policy CC1 is not considered to be justified and is inconsistent with the second test of soundness. The proposed shift in standards from April 2030 represents a substantial and abrupt escalation in expectations. Although the policy refers to schemes such as Tai ar y Cyd and AECB CarbonLite, these examples largely relate to grant funded affordable housing projects. There is no robust evidence that equivalent standards can be met on mainstream housing sites without undermining overall viability. The Development Plans Manual requires policies to be based on strong evidence and to be realistically deliverable across the plan period. Without this, there is a risk that the proposed policy could impede
housing delivery and compromise the RLDP's ability to meet identified needs.

Policy CC1 could also lead to inconsistent energy performance requirements across Local Planning
Authorities in Wales, contradicting the advantages of a unified regulatory system via Building Regulations. For volume housebuilders working across several authority areas, this would introduce unnecessary variation and complication. The DPM highlights the importance of policies that support housing delivery and avoid avoidable burdens. By introducing bespoke modelling thresholds and
operational monitoring requirements, CC1 risks blurring the line between planning and Building Control, raising questions about the policy's justification and practical application.

It is Persimmon's view that Policy CC1 is premature and that it is more appropriate for such matters to be addressed through building control rather than planning policy. In its current form, the policy risks impacting housing supply, affordable housing delivery and overall implementation across the plan period. For these reasons, we consider that

Policy CC1 fails to satisfy the relevant tests of soundness and should be removed from the emerging RLDP.

Summary

As summarised above, and set out in full detail within the supporting survey/assessment work that has been provided to the Local Authority in relation to the site, the inclusion of Land at North West Barry as a Key Site (Policy HG1: KS1) with the Replacement Plan fully accords with the RLDP strategy. Furthermore, it is considered that (with the inclusion of the site), the Deposit Plan complies with the tests of soundness. Further to ongoing discussions with the Authority, we would reiterate the Site Promoter's commitment to delivering the allocation which has been evidenced as being entirely deliverable and viable
As set out within this representation, overall support is provided for the Deposit Plan (and the inclusion of North West Barry as a Key Site), however, as detailed, bjections are submitted in relation to the specific elements of the proposed wording of the Key Site policy (SP4: KS1).

We look forward to the RLDP progressing towards examination, and would welcome the opportunity to take part in the relevant Hearing Sessions (in relation to Policy HG1: KS1, and wider strategic policies as required). Please do not hesitate to contact me should you require any further detail or wish to discuss any aspect of the representations.

Change suggested by respondent:

That the overall growth levels for the Replacement Plan are revisited (and increased accordingly).

Sound: Not specified

Attachments:

Persimmon Submission - https://valeofglamorgan.oc2.uk/a/367

6738 Support

Document Element: SP6 - HOUSING REQUIREMENT

Respondent: Hallam Land Management [854]

Agent: Savills

Summary:

Hallam are generally supportive of the aims of this policy. The housing requirement should reasonably be seen as the minimum number of homes that the RLDP should be aiming to deliver.

Full text:

1.1. Savills is instructed by Hallam Land ('Hallam') to respond to the consultation on the Deposit version of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').
1.2. Hallam is the strategic land arm of Henry Boot PLC and is one of the UK's most well established and successful land promoters. Hallam operates throughout England, Scotland and Wales from 7 regional offices working with landowners, developers, local authorities, communities and other parties to bring forward development opportunities. Hallam has been in operation since 1990, specialising in obtaining planning permission and delivering development larger schemes including new communities and urban extensions.
Background to Representations
1.3. The Preferred Strategy was published in November 2023. The Preferred Strategy identified "Land West of St Athan" and "Land South of the B4265, St Athan" (Site IDs 456 and 457) as one of five Key Sites in the Preferred Strategy. Both of these sites are under the control of Hallam and were submitted as part of the Call for Sites. A site-specific illustrative masterplan and policy wording were provided under Policy SP4 KS5 (Land to the West of St Athan).
1.4. Hallam submitted representations on the consultation on the Preferred Strategy. These representations were very much supportive of the identification of "Land to the West of St Athan" as a Key Site and the approach that was taken more generally taken in the Preferred Strategy.
Approach to Responding to Consultation
1.5. The VoG has published the Deposit version of the RLDP. The Deposit is the first version of the RLDP to include emerging allocations, and detailed development management policies, as well as a Proposals Map. It is accompanied by a substantial evidence base which includes various supporting technical documentation submitted as part of the promotion of the allocated sites.
1.6. Building upon the Preferred Strategy, the Deposit RLDP proposes to allocate Land to the West of St Athan as a Key Site. The site is identified under Policy HG1 KS5 (Land to the West of St Athan) as key mixed-use site with capacity for 600 new homes alongside new community and commercial facilities.
1.7. Hallam's representation to this consultation broadly splits into three separate sections:
• It offers general support for the housing requirement, growth strategy and settlement hierarchy. This is covered in Chapter 2 of this Statement;
• It wholly supports the approach of allocating Land to the West of St Athan as part of the Deposit RLDP whilst also providing detailed commentary on the specific wording of Policy HG1 KS5 (Land to the West of St Athan). This is covered in Chapter 3 of this Statement; and
• It provides commentary on a range of development management policies. This is covered in Chapters 4, 5, 6, and 7 of this Statement.
1.8. As well as this Statement, Savills has provided commentary on these specific policies under the VoG's consultation

website.

Policy SP1 (Sustainable Growth Strategy), Policy SP2 (Settlement Hierarchy), and Policy SP6 (Housing Requirement)
2.1. Together, these policies have the effect of:
• Setting the housing requirement to be delivered over the RLDP plan period of 7,890 homes with a flexibility allowance applied on top so that provision is made for a total of 8,660 homes. This is the same housing requirement to that included in the Preferred Strategy which was found by Welsh Government to be in conformity with Future Wales (Policies SP1 and SP6);
• Identifying the extent of the Strategic Growth Area as the primary focus of new housing growth. Concentrations of new housing are focussed in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity. St Athan is a specifically named settlement within the Strategic Growth Area (Policy SP1); and
• Identifying St Athan as a Primary Settlement in the third tier of the settlement hierarchy. This is the same tier of the settlement hierarchy as St Athan is in the adopted LDP (Policy SP2).
2.2. Hallam are generally supportive of the aims of these three policies.
2.3. They recognise that the housing requirement has been subject to extensive scrutiny and been found to be appropriate by Welsh Government in response to the Preferred Strategy. In that sense, there is nothing further for Hallam Land to comment upon here other than to note that it should reasonably be seen as the minimum number of homes that the RLDP should be aiming to deliver, particularly following the publication of the 2022-based household projections between Welsh Government's comments on the Preferred strategy and the publication of the Preferred Strategy.
2.4. The strategy – of focussing new housing in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity – is wholly supported. St Athan is clearly already a sustainable location for growth and its sustainability and connectivity have clear potential to enhance alongside further development. The delivery of growth in St Athan is therefore considered to firmly align with the RLDP's strategy.
2.5. The continued positioning of St Athan as a Primary Settlement in the third tier of the settlement hierarchy is considered appropriate though clearly the delivery of two Key Sites within St Athan as part of the RLDP has the potential to further elevate its position in the future. This is reflected in Table 10 of Background Paper 5 Settlement Appraisal Review where St Athan is given one of the higher scores of the Primary settlements.

Policy HG1 KS5 (Land to the West of St Athan)
3.1. Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.
3.2. There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.
3.3. The relevant policy for Land to the West of St Athan is Policy HG1 KS5.
3.4. As a starting point, Hallam wholeheartedly support the allocation of Land to the West of St Athan as a Key Site within the RLDP. Hallam made a comprehensive submission as part of the Call for Sites stage and since then have worked proactively with the VoG and other stakeholders to demonstrate that the site is suitable, deliverable, and viable. It's identification as a Key Site in the Deposit RLDP represents extensive and thorough assessment – its proposed allocated is therefore considered to be sound and firmly evidence based.
3.5. So that the policy functions as effectively as possible, Hallam has a small number of comments and included at Appendix A is a re-worded version of Policy HG1 KS5 which incorporates those changes with text suggested to be removed crossed through and text to be added shown underlined.
3.6. These proposed adjustments are considered in turn below and are structured around the sub-headings that are contained within the policy wording itself.
Site Capacity and Housing Trajectory
3.7. Extensive environmental and technical work has been undertaken by Hallam to support the promotion of the site and the development of a masterplan (and site capacity) that responds to the site's constraints and opportunities.
3.8. That said, Hallam is not a housebuilder and once an outline planning application has progressed, Hallam will identify a development partner (which could be a single or multiple housebuilders / housing associations). Clearly different housebuilders have different house types and differing approaches to density.
3.9. In addition, whilst a lot of technical and environmental work has been undertaken to date, clearly further technical work would be submitted at planning application stage which would further validate the site's capacity.
3.10. Legislative and guidance changes also have the potential to impact a site capacity. Whilst the masterplanning process has been prepared to be SAB compliant, the impact of the introduction of the requirement to secure SAB approval has had an impact on site capacity and it follows that a further, and as yet unknown, legislative or guidance change could have a similar impact.
3.11. This is not to suggest that there isn't a high degree of confidence that the site can deliver roughly 600 homes, rather that Hallam suggest that the word 'approximately' is added to the policy wording to reflect the potential for a degree of deviation (which could be upwards or downwards).
3.12. Background Paper 9A Housing Land Supply and Housing Trajectory sets out the anticipated annual delivery rates

for housing over the RLDP. With regards to the ability of the site to deliver the number of homes it is allocated for in the RLDP plan period, the housing trajectory for the site reflects that the first completion date was pushed back from 2027/2028 to 2028/2029 since the consultation on the Preferred Strategy. This means that the whole site continues to be shown as being delivered within the RLDP plan period.
3.13. Hallam support and agree with the approach set out in the Draft Housing Trajectory and see it to be realistic and achievable based on their experience and subject to usual caveats around the condition of the market, RLDP progression, and swift determination of a planning application.
Affordable Housing
3.14. At present, Policy HG1 KS5 (like all of the standalone policies for the other four Key Sites), states that the site should provide a minimum of 210 affordable housing units. This figure is derived from 35% of the number of homes that the site is allocated for (600 homes).
3.15. Worded at present, a strict interpretation of this policy could be that 210 affordable units must be provided onsite regardless of the total number of homes that are proposed. For example, it could be interpreted as requiring a fixed number of affordable homes of 210 homes, even if the total number of homes that are proposed on the site is fewer than the 600 homes that the site is allocated for or, conversely, that only 210 homes should be delivered as affordable if more than 600 homes were to be delivered and the RLDP allocation exceeded.
3.16. Hallam recognise that this is not what the policy wording is seeking to achieve (and their viability work for the site is based on the site delivering 600 homes of which 35% are affordable) but suggest that its wording could be clarified by removing reference to a specific number of affordable homes for the site to deliver in favour of just the affordable housing percentage being noted in the policy.
3.17. Hallam also suggest that the requirement for affordable housing units to not be in clusters of more than 10 homes is removed and that the approach is for this to be considered on a site by site and case by case basis and with recognition that Policy HG5 (Affordable Housing Exception Sites) which can provide a framework for 100% affordable sites of more than 10 homes to be delivered. As an example, and in the case of Land to the West of St Athan, the “Land South of the B4265, St Athan” (Site ID 457) portion of the site is likely better suited to a mixed-use development alongside the future St Athan Railway Sation. This portion of the site is probably better suited to a flatted form of development (either above non-residential uses or as a block) which tend to be delivered as 100% affordable housing developments rather than comprising a mix of private and affordable housing.
Sustainable Transport and Highways
3.18. This part of the policy sets out expectations relating to sustainable transport and highways and there are a number of matters which Hallam wish to comment on.
3.19. As a starting point, Hallam support the delivery of St Athan Railway Station and therefore commits to its safeguarding. Likewise, Hallam recognise the potential suitability for the “Land Between the Railway Line and B4265, St Athan” (Site ID 458) site to accommodate a Welsh-Medium Secondary School and can also therefore commit to safeguarding land for the delivery of a pedestrian and cycle bridge over the railway line. Specific comments on Policy TR1 (Transport Proposals) and Policy CI3 (New Community Facilities) are made elsewhere in this Statement.
3.20. With regards to the Sustainable Transport and Highways section of Policy HG1 KS5, Hallam’s overall position is that a careful balance needs to be reached between the policy wording being explicit as to what highway works must be delivered and reserving consideration of this until planning application stage where the exact site capacity is better understood and a full Transport Assessment submitted.
3.21. At present, Hallam’s view is that the policy wording is overly explicit and suggest that it could be qualified through the addition of the following text before listing the offsite highways improvements:
‘Subject to the Strategic Transport Assessment and site-specific Transport Assessment submitted at planning application stage’.
3.22. Turning to the specific offsite highways measures that are listed within the policy wording, Hallam have four comments.
3.23. Firstly, it is suggested that the delivery of an active travel link along the B4265 between the site entrance and the Gileston Road junction should be secured via a financial contribution that is pooled with KS4 Church Farm. This reflects that the delivery of this link not only links Hallam’s site to other services in St Athan but also linking KS4 Church Farm to the services that are proposed and uses for which land is safeguarded within Hallam’s site. Clearly this is also to the benefit of existing residents of St Athan. This would reflect the approach that is proposed to be taking for the pooling of Section 106 monies for the delivery of an active travel route between St Athan and Llantwit Major.
3.24. Secondly, Hallam flag the need for the RLDP to be sufficiently flexible with regards to the delivery of an active travel link between St Athan and Llantwit Major. Ultimately, the purpose of delivering this active travel route would be to provide a connection from St Athan to Llantwit Major Railway Station and the delivery of a Railway Station in St Athan would remove the necessity of delivering this active travel connection. Hallam’s suggested amendments to the policy wording seeks to reflect this.
3.25. Thirdly, Hallam have been consistent in highlighting that, whilst there is an aspiration to deliver an improved pedestrian link along Llantwit Road, a combination of the road width and the extent of third party ownerships make delivering a continuous link very challenging with a pragmatic approach instead needing to take place that recognises the ability to deliver betterments but acknowledges that delivering a continuous link is unlikely to be possible. Hallam has suggested additional wording to clarify this.
3.26. Fourthly, Hallam highlight that the designing of a loop road within the site to facilitate access by a bus may be superfluous and represent an over-engineered solution given the potential for the St Athan Transport Interchange that land is safeguarded for under Policy TR1 (Transport Proposals) is envisaged to accommodate infrastructure to accommodate a bus connection. On that basis, it is suggested that the following clause is added to the policy wording to reflect that bus connectivity to the site may be delivered not via an internal bus loop:
‘Subject to progress on the St Athan Transport Interchange as land is safeguarded for under Policy TR1 (Transport

Proposals)'
Community Infrastructure
3.27. There are three points which Hallam wish to make in connection to this element of Policy HG1 KS5.
3.28. Firstly, Hallam suggest that the wording of the part of the policy relating to financial contributions to fund the delivery of additional school places needs to be adjusted. At present this part of the policy is worded as if there is an automatic requirement to provide Section 106 monies for school places where Circular 13/97 is clear that a contribution should only be sought where the schools do not have current projected capacity to accommodate the new children from the development. Hallam's proposed adjustments seek to ensure that this part of the policy reflects this though note that Background Paper 43 Education forecasts a need for a financial contribution to be made for additional school places at all English and Welsh primary and secondary schools that the site is within the catchment of.
3.29. Secondly, Hallam note that Table 10 of Background Paper 34 Community Facilities identifies an existing over-provision of community space within the St Athan Ward of 778sqm and a surplus of 531sqm of community floorspace at 2036 when the level of housing to be allocated in the Deposit RLDP is delivered. It is understood that this is on the basis of no community floorspace being delivered as part of Hallam's proposals or as part of the KS4 Church Farm site. Hallam suggest that the wording of this element of the policy needs to reflect that community floorspace should only be required to be provided in the case of a local shortage in provision. Aligned to this, Hallam also suggest that the reference to specifically providing a 'community building' is adjusted to instead make reference to 'community space'. This reflects that the community space element of scheme, if indeed it is actually required, could be a part of a larger mixed-use building (probably in the Mixed-Use / Community area) rather than as a standalone building.
3.30. Thirdly, Hallam note the error in the wording of the sixth bullet point under the 'Sustainable Transport and Highways' heading where reference is made to the safeguarding of land on the southern side of the railway line as being identified in Policy CI3(2) where-as it should be Policy CI3(6). This is a minor amendment that should be made to ensure consistency.
Green Infrastructure, Recreation Spaces, and Biodiversity
3.31. The masterplan prepared by PAD Design and submitted by Hallam shows the site delivering a mix of public open space and green infrastructure including the provision of allotments, a Neighbourhood Equipped Area of Play, a Local Equipped Area of Play, and a sports pitch. This is welcomed in Background Paper 32A Green Infrastructure Assessment of Key Sites which, at Paragraph 5.55 recognises that a 'ground up' approach has been taken in the masterplanning approach.
3.32. This is shown indicatively to illustrate the composition of public open space and green infrastructure that the site could provide alongside the other elements of built development that the site is allocated and the masterplan makes provision for.
3.33. Whilst, Hallam recognise the need to provide public open space, the starting point for this should be the Fields In Trust Standards and Hallam therefore suggest an approach where the policy wording is not specific about what forms this should take.

Policy TR1 (Transport Proposals)
4.1. This policy identifies three active travel routes and two public transport schemes that the Deposit RLDP safeguards land for, as well as three highway improvement schemes that are identified as being required to mitigate the impact of development. Two of these are in St Athan – one being the St Athan Transport Interchange for which land is safeguarded for and the second being the Gileston Road Junction which is identified as a required highway improvement. Both are considered in turn below.
St Athan Transport Interchange
4.2. Hallam support the safeguarding of land for the St Athan Transport Interchange and see that its delivery would be to the benefit of the Key Site itself but also more broadly to St Athan and western parts of the VoG.
4.3. It is clear from discussions with Transport for Wales that there is a strong business case for the delivery of a railway station and that the creation of "critical mass" through residential development around it has a key role in driving its delivery, as does the nationally significant economic role that the Bro Tathan Enterprise Zone has and the Aberthaw Green Energy Park will have. The proximity of St Athan to both of these hubs clearly contributes to its fundamental sustainability and suitability for growth whilst the further development of a critical mass of housing and employment generating uses will further support linkages between them and strengthen the business case for a new railway station at St Athan. This is reflected in TFW's 'Today, Tomorrow, Together: A Vision for Rail Across Wales and the Borders' which confirms that the delivery of St Athan Railway Station remains in TFW's pipeline which has been endorsed by the Westminster Government.
4.4. The location that is identified on the Proposals Map is Transport for Wales' preferred location within the site and has been incorporated into the masterplanning approach which seeks to create a node around it by incorporating a bus interchange and a mix of uses.
4.5. At present, the Proposals Map identifies the location of the Railway Station using a red star which is positioned on the railway line itself but without the required land take not spatially being defined.
4.6. Whilst Hallam recognise that the exact land take required will need to be refined further through discussion with TFW, it may be the case that the mixed-use element on this portion of the site comes forward before the Railway Station.
4.7. The early delivery of these elements should be welcomed as clearly the mixed-use element both enhances the range of services and facilities in St Athan but also would mean that the Railway Station is integrated upon delivery.
4.8. On that basis, it is imperative that the safeguarding of land for the Transport Interchange is limited only to that land required to deliver the Transport Interchange and is done in such a way such the safeguarding does not sterilise non-transport related development from this portion of the site until the Railway Station has been delivered.
Gileston Road Junction, St Athan
4.9. Paragraphs 6.199 and 6.200 relate to the expectation that vehicle trips as a result of RLDP allocations in St Athan

are anticipated to trigger the need to upgrade the Gileston Road Junction to a signal-controlled arrangement. This is informed by the conclusions of Table 3 of the Strategic Transport Assessment which forecasts that the junction will be operating above capacity during both the weekday AM and PM peak by the RLDP's end point.
4.10. Hallam note that Technical Note 08 of the Strategic Transport Assessment identifies that the improvements to the Gileston Road Junction are to be delivered by VoG and funded through financial contributions from seven sites that the RLDP proposes to allocate.
4.11. Improvements to this junction are to be funded by a number of sites; however it is unclear whether (and if so, when) forward funding will be secured by the Council and clearly there cannot be a situation where none of the sites can deliver homes until strategic highways works are funded / completed. We therefore seek further clarification over the phasing of these works and note that early delivery of homes ahead of strategic highway improvements is likely to be important for deliverability of each strategic site.
4.12. To respond to Hallam's above comments, one approach could be for references to highway improvement works to be entirely removed from this policy or, if they are to remain, that qualifying text is added to note that the need for and format of any improvements will be subject to detailed consideration at planning application stage and that such contributions must be justified in planning terms, particularly where (in the case of Pen Y Turnpike Road and Waycock Cross for Land to the West of St Athan), the distance from a site and the junction to be improved is significant and therefore thee number of vehicle trips that would be generated modest.
4.13. This aligns with Hallam's suggested approach to the specific wording of Policy HG1 KS5.

Policy CI1 (Open Space Provision)
5.1. This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.
5.2. Hallam note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.
5.3. Hallam is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter.

Policy CI3 (New Community Facilities)
6.1. As well as allocating land for five new or improved education developments, this policy safeguards 'Land South of the Railway Line, St Athan' for the delivery of a Welsh-medium secondary school.
6.2. This policy is clearly of interest to Hallam because Paragraph 6.250 places a requirement for the safeguarding of land on the northern side of the railway line on their Land to the West of St Athan Key Site for a footbridge to land on.
6.3. With the policy wording being intentionally light-touch, Paragraph 6.250 of the Deposit RLDP provides greater detail about the safeguarding of this land (and other paragraphs in the Deposit RLDP relate to other community facilities that Policy CI3 covers). It effectively does two things.
6.4. Firstly, it notes that the delivery of this school will require active travel improvements including the safeguarding of land for a pedestrian and cyclist footbridge over the railway line.
6.5. Secondly, it is clear that the safeguarding of this land is in response to a forecast increase in demand for Welsh-medium secondary school places across the whole of the VoG as a result of expanded capacity at Welsh-medium primary schools across the VoG. On this basis, it follows that this location has been selected as a preferred location because of its ability to serve the wider sub-region.
6.6. Hallam recognise that this site could be a suitable location for a Welsh Medium Secondary School and, as a principle, is agreeable to the safeguarding of land for the footbridge landing on the northern side of the railway line.
6.7. Paragraph 6.250 of the Deposit RLDP is clear that the delivery of a Welsh-Medium secondary school is in response to a regional / sub-regional demand rather than a local need as a result generated either by the development of Land West of St Athan or other emerging allocations within St Athan and it cannot be the case that Hallam are expected to make disproportionate contributions to either the delivery of the school or required active travel improvements just because they have control of the site or that it is next to the Key Site.

Policy CC1 (Residential Operational Net Zero Carbon Development)
7.1. The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) before the policy wording sets out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.
7.2. As a starting point, Hallam share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) can present challenges. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this will result in an uneven framework for housebuilders, significantly adding cost and reducing certainty.
7.3. The justification for using planning policy to set requirements exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging

policies.
7.4. There are two points to be made by Hallam here:
7.5. Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage that such an approach would not be sound. This Written Ministerial Statement was subject to an unsuccessful judicial review.
7.6. Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations. Where there are existing Local Plans in England that take this approach, they do not align with the Westminster Government's position and there will be no Local Plans emerging including such policies.
7.7. Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs (Bridgend and Merthyr Tydfil) do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound at Examination stage.
7.8. Secondly, Hallam have concerns with the approach that has been taken with regards to viability.
7.9. From Hallam's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.
7.10. As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated. This is important as it demonstrates that, whilst Hallam do not believe such a policy approach should be taken, the development of the site at the time of the completion of the Development Viability Model for the site is viable whilst meeting the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development).
7.11. Hallam's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. This concern is particularly exacerbated by the fact that, as recognised at Paragraph 6.47 of Background Paper 42 Viability Assessment, takes the lowest estimate for the works required to achieve these policy expectations, Savills' experience – both that of their development land team based in Wales and their environmental sustainability team based across England - is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.
7.12. Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy DNP3 (Glamorgan Heritage Coast)
8.1. This policy relates to the Glamorgan Heritage Coast, identifying a series of land uses that are permissible within the policy area before setting three tests that must be satisfied for development within the Glamorgan Heritage Coast to be permissible where there is an adverse environmental impact.
8.2. Hallam note that the 'Land South of the B4265, St Athan' portion of the land that they control is both proposed to be retained as part of the Glamorgan Heritage Coast (a continuation of the position taken in the adopted LDP) whilst also forming part of the Land to the West of St Athan Key Site where the masterplan at Figure 17 shows it as accommodating the potential new railway station and a mixed-use area (including car parking).
8.3. The relevant extract of the Proposals Map is replicated below:
8.4. The exact composition of the buildings proposed on this portion will require further refinement and will need to be driven by occupier requirements, but the masterplanning work undertaken by pad Design envisages that they could provide a mix of retail and food and drink uses most likely across some or all of the ground floor, alongside workshop, co-working or office incubator space at upper floor levels and perhaps at ground floor level. There could also be the potential for additional homes, likely in the form of apartments at upper floors, as part of a mix of uses. It is realistic therefore to anticipate that this portion of the site will accommodate buildings of up to three or four storeys with a high plot ratio to reflect the uses and supporting infrastructure that it is to accommodate.
8.5. Hallam's position is that the continued inclusion of this parcel of land as part of the wider Glamorgan Heritage Coast is inappropriate for two reasons.
8.6. Firstly, and its most basic level, the approach of allocating the site for development whilst retaining a designation that inherently seeks to restrict the type, form, and quantum of development, is wholly contradictory.
8.7. Designation of this portion of the site as part of the Glamorgan Heritage Coast will mean, given that the uses that Figure 17 envisages as being delivered on the site are not those that the first part of Policy DNP3 (Glamorgan Heritage Coast) allows for, any application for development will need to demonstrate that there is a compelling need for the development, that the benefits outweigh the harm, and that appropriate mitigation measures are in place. This the potential to prejudice its development or, at very least, greatly impact how it is developed whilst requiring.
8.8. Secondly, it is difficult to see how this land warrants ongoing inclusion within the designated Glamorgan Heritage Coast. This is something that is considered in more detail in the Review of Landscape Character and Visual Amenity (December 2022) prepared by FPCR and submitted as part of the Call for Sites (and also available as part of the consultation on the Deposit RLDP as a piece of Key Site Supporting Information). Paragraph 5.13 of the FPCR document concludes on this piece of land that:
'Through the fieldwork it is considered that the Site does not display any "special environmental qualities" identified by

the Policy and plays no intrinsic role in the Policy designation, as it is effectively forms a rather ordinary grazing field. It is influenced by the urbanising elements of the adjacent B4265, the Railway Line, the Tarmac Cement works, and to some degree the built edge of St Athan. Furthermore, it is bound and contained by trees and woodland beside the railway line, which prevents wider intervisibility with the coastline.'
8.9. Taking the above together, Hallam suggest that the preparation of the RLDP provides the opportunity to define the extent of the Glamorgan Heritage Coast to respond to both the landscape value of certain sites but also the wider aspirations of the RLDP. If it is not within the gift of VoG to redefine the boundaries of the Glamorgan Heritage Coast through the RLDP then Hallam suggest that an additional element could be added to this policy to confirm that it does not apply to land which is allocated for development.

Appendix A - rewording of Policy HG1 KS5

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3y3

6766 Comment

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Persimmon Homes (East Wales) [1068]
Agent: Boyer Planning

Summary:

Persimmon supports the overall principle of a medium growth strategy. However, given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

The housing requirement is based on average completion rates over the first ten years of the adopted Local Development Plan. However, a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved. A five-year average build rate of 780 units per annum was acheived between 2016 and 2021.

The ten-year average delivery rate fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation.

The current adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.

Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP.

The DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. The 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026) have been published. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%and the Vale has the largest percentage increases (up 11.7%).

It remains unclear whether existing unmet need has been fully factored into the overall housing requirement. This is particularly important in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need. There is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.

For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.

Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.
Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.
In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out

in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority. Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes

annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.

Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement

From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.

As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.

Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.

Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified "has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area." It also notes that this level of growth has been chosen so that it is "complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).".

Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.

Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.

In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates

which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

Policy SP2 – Settlement Hierarchy

In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.

Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.

Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.

Policy SSC1 – Development within Settlement Boundaries

Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.

Policy SP4 – Placemaking

In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.

The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.

In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car. Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.

The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.

Policy PGD1 – Creating Well Designed and Inclusive Places

Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.

On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.

Policy PGD2 – Residential Development Densities

Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.

From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.

A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure

requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the

Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.

In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.

By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.

Policy HG1 (B) – Housing Allocations

HG1 (3) Barry - Land at Hayes Lane

Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:

Unsustainable Location & Poor Connectivity

Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.

Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.

As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.

The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.

Loss of Allocated Employment Land

Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.

Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability

to meet the region's employment needs up to 2036.
By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
Policy HG3 – Housing Led Redevelopment Opportunity
Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
Policy SP7 – Affordable Housing Provision
In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
Policy SP8 – Affordable Housing Requirements
Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.

Policy SP10 – Sustainable Transport
Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.
In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
Policy TR1 – Transport Proposals
Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.
In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.
Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.
Policy SP13 – Community Infrastructure and Planning Obligations
Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
Policy CI1 – Open Space Provision
Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.
The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.
Productive and Enterprising Places
Policy CC1 – Residential Operational Net Zero Carbon Development
Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.
Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing

additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.

The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.

Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.

Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.

Distinctive and Natural Places

Policy SP19 – Green Infrastructure

In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.

For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.

The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.

Policy SP20 – Biodiversity and Ecosystem Resilience

In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Policy DNP1 – Special Landscape Areas

Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.

Policy DNP2 – Green Wedges

Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.

Policy DNP8 – Severn Estuary Recreational Pressure

Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that

key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
Conclusion
Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes' most pertinent comments on the consultation document are summarised below:
• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

Sound: Not specified

Attachments:
Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/38r

6771 Comment

Document Element: SP6 - HOUSING REQUIREMENT, Table 2: Housing Supply
Respondent: Persimmon Homes (East Wales) [1068]
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Summary:

Existing land supply - The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

Windfall - The Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. We do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036, but it is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year. periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives

Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced

significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.
Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.
In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage

Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to

incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.
Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual
As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement
From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a

more consistent supply of homes to be achieved over the plan period as a whole.
Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.
In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.
Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.
Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.
Policy SSC1 – Development within Settlement Boundaries
Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.
Policy SP4 – Placemaking
In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.
In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car. Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.
The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality

architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.
Policy PGD1 – Creating Well Designed and Inclusive Places
Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.
On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into

the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris

Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
Loss of Allocated Employment Land
Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
Policy HG3 – Housing Led Redevelopment Opportunity
Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
Policy SP7 – Affordable Housing Provision
In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would

prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
Policy SP8 – Affordable Housing Requirements
Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.
Policy SP10 – Sustainable Transport
Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives.
Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.
In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
Policy TR1 – Transport Proposals
Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.
In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.
Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.
Policy SP13 – Community Infrastructure and Planning Obligations
Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks.

Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.

Policy CI1 – Open Space Provision

Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.

The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.

Productive and Enterprising Places

Policy CC1 – Residential Operational Net Zero Carbon Development

Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.

Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.

Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.

The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.

Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.

Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.

Distinctive and Natural Places

Policy SP19 – Green Infrastructure

In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.

For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.

The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside

supplementary planting to naturally integrate the site into the wider landscape framework.
Policy SP20 – Biodiversity and Ecosystem Resilience
In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.
Policy DNP1 – Special Landscape Areas
Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.
Policy DNP2 – Green Wedges
Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.
Policy DNP8 – Severn Estuary Recreational Pressure
Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
The policy also provides no clear threshold or criteria for determining what level of activity would constitute “visitor pressure” or an “adverse impact” on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan’s ability to meet its housing requirements and risk finding the RLDP unsound.
Conclusion
Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes’ most pertinent comments on the consultation document are summarised below:
• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale’s position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan’s ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that

it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

The RLDP should incorporate a greater flexibility allowance to provide certainty that any shortfalls/fallow periods are offset and enable a more consistent supply of homes to be achieved over the plan period as a whole.

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/38r

6820 Object

Document Element: SP6 - HOUSING REQUIREMENT

Respondent: Mr Ian Fairweather [1225]

Agent: Boyer Planning

Summary:

There are concerns regarding a need for a higher housing level and the need for development to be appropriate placed in sustainable allocations in a settlement in which people want to live is still relevant.

Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

To accommodate this increased in flexibility allowance and over all housing numbers, it should be outlined that smaller sites typically deliver more quickly, are less infrastructure-dependent, and increase build-out rates through diversification.

Full text:

The Spinney, St Nicholas (Site Ref: 460)
Boyer have prepared the following representation on behalf of Mr Fairweather in response to the current Vale of Glamorgan Replacement Local Development Plan (RLDP) 2021-2036 Deposit Plan Consultation.

A summary of our main representations is as follows:
• Significant concern is raised regarding the lack of residential allocations within the Minor Rural Settlements, in particular St Nicholas.
• Concern regarding the overall housing requirement and the need for an increased flexibility allowance.
• Questions asked regarding the spatial distribution and the lack of other allocations to provide a range and choice of housing.
• Confirmation of the limited constraints for The Spinney, St Nicholas (Site Ref: 460).
• Review of the Candidate Site Assessment; and
• Need to review the Settlement Boundary of St Nicholas.

SP1: Sustainable Growth Strategy
Whilst Policy SP1 outlines the housing delivery requirement (addressed under the response to SP6), the main concern for Mr Fairweather is the proposed primary focus of housing growth within the Vale being within the Strategic Growth Area. Whilst it is understood and supported by Mr Fairweather that new housing developments would be concentrated in locations which are served by existing public transport routes and provide the opportunity to enhance sustainable transport connectivity, it is shortsighted to concentrate this growth specifically along the railway line. The justification being that those settlements identified as being 'Outside of the Strategic Growth Area' – including St Nicholas, are equally as important as those within. St Nicholas is a sustainable location and located on an important public transport route (A48) and is well served by bus transport.

The principle of locating development at sustainable settlement is supported, however Mr Fairweather considered that limiting development at suitable settlements outside the Strategic Growth Area is not the correct approach and that greater flexibility is required to deliver the housing need. Currently under Policies HG1 and HG4, the only allocations in any Minor Rural Settlements amount to 122 dwellings in total (excluding any from St Nicholas). This also needs to be considered in the context of the 1,303 dwellings expected from large and small windfall developments. Clearly there is a requirement to provide further allocations in sustainable Minor Rural settlements identified as being 'Outside of the Strategic Growth Area' – namely St Nicholas.

In context of above, Mr Fairweather strongly recommends that appropriate consideration is given to the widening of the Strategic Growth Areas to include St Nicholas as a sustainable settlement which is capable of accommodating a new allocation at The Spinney (Site Ref: 460).

SP2: Settlement Hierarchy
Mr Fairweather previously supported the identification of St Nicholas as a Minor Rural Settlement and acknowledged its capacity to accommodate proportionate and sustainable growth, particularly given its accessibility and relationship with Cardiff to the east and access to Bridgend to the West. The Deposit Plan retains St Nicholas within the Minor Rural Settlement tier, however, does confirm that the settlement is outside the Strategic Growth Area.

Whilst the overarching principle of directing growth to the most sustainable settlements is supported, the Plan does not clearly demonstrate why settlements that are well connected and functionally related to larger centres, such as St Nicholas, should be subject to such constrained growth.

In this context, Mr Fairweather highlights Paragraph 3.10 which indicates that Minor Rural Settlements provide an 'important range of services and facilities that play a functional role in meeting some of the basic needs of residents within rural areas, reducing the need to travel'.
Building upon this, Policy SP2 does highlight that 'Minor Rural Settlements identified will be limited to the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments'.

Furthermore, the supporting text to Policy SP2 (Paragraph 6.17) confirms that 'those settlements that are considered to have sufficient population, services, and facilities to accommodate small scale growth without it having a detrimental impact on their existing character and local environment'.

This all buildings upon the identified importance of Minor Rural Settlements within the Preferred Strategy which outlined in Paragraph 6.50 that it is 'essential for the LDP to balance the growth in a way that supports the need of rural communities' and whilst it is evident that within these settlements 'general market housing will be limited to opportunities including infill' (Paragraph 6.51), the enabling of an element of 'open market housing will provide opportunities for the delivery of affordable housing reflecting the aspirations of rural communities to sustain their housing needs' (Paragraph 6.51). This importance of Minor Rural Settlements needs to be carried more strongly forward in the Deposit Plan.

Moreover, the evidence base does not sufficiently justify the degree of restriction now applied, nor does it explain why proportionate additional growth in appropriate Minor Rural Settlements would undermine the spatial strategy. As drafted, the policy risks limiting flexibility in the distribution of housing across the Vale. Accordingly, it is considered that the approach to St Nicholas under Policy SP2 is not justified.

Clearly there continues to be a disconnect between the identified role and function of St Nicholas, which is supported, and the actual ability to deliver the appropriate range and choice of dwellings in the rural settlements. For example, The Spinney, St Nicholas (Site Ref: 460) is considered to naturally round-off the existing boundary, enclosing the envelope of development, without encroaching or sprawling beyond the existing line of built form, in a sustainable location which can accommodate an appropriate allocation.

SP6: Housing Requirement
As per Mr Fairweather's previous comments to the Preferred Strategy, the concerns regarding a need for a higher housing level and the need for development to be appropriate placed in sustainable allocations in a settlement in which people want to live is still relevant.

Currently Policy SP6 establishes the overall housing requirement and applies a 10% flexibility allowance. The Policy suggests that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes and this will be delivered by:
• 3,837 dwellings from the existing land supply
• 3,520 dwellings on allocated sites
• 1,303 dwellings from large and small windfall developments

As per previous representations, Mr Fairweather considers that it's important to take account of recent guidance provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan. For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to

an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
More recently in Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery.
Applying the same approach to other current Local Development Plans, it is evident that a flexible housing allowance above the current 10% threshold will be required. Having reviewed the Council's evidence base Mr Fairweather considered that a minimum allowance of 15% would be reflective of the County's growth aspirations and would seek an additional circa 400 dwellings (equating to a housing requirement of 9,074 dwellings inclusive of the 15% flexibility).

To accommodate this increased in flexibility allowance and over all housing numbers, it should be outlined that smaller sites typically deliver more quickly, are less infrastructure-dependent, and increase build-out rates through diversification. The Spinney represents precisely the type of deliverable site that should form part of an enhanced flexibility allowance.

Policy SP6 should therefore be amended to increase the flexibility margin to up to 15%, with consequential allocation of additional small and medium-sized sites.
HG1: Housing Allocations Table 3 spatial distribution
Mr Fairweather does not comment on any of the proposed housing allocations, however, does highlight that the delivery in incumbent upon a number of larger strategic sites, and that to allow a greater range and choice then smaller allocations in the Minor Rural Settlements. Only 161 units are proposed on smaller allocated sites, equating to approximately 7% of newly allocated supply.
In the context of the above, there remains significant concern that the spatial strategy continues to exclude allocations within Minor Rural Settlements, including St Nicholas.

The Plan recognises that Minor Rural Settlements provide an important range of services and facilities and play a functional role in meeting the needs of residents within rural areas. It further acknowledges that it is essential for the LDP to balance growth in a way that supports rural communities. Whilst general market housing is described as being limited to infill opportunities, the Plan also recognises that enabling an element of open market housing provides opportunities for the delivery of affordable housing and helps sustain rural communities.

There is therefore a clear disconnect between the identified role and function of settlements such as St Nicholas and the absence of any allocated sites (excluding the affordable led schemes under Policy HG4) capable of delivering an appropriate range and choice of dwellings. The strategy effectively restricts development to windfall and infill, without positively identifying opportunities that would logically consolidate and strengthen the settlement.

This approach is inconsistent with the settlement's accessibility and functional role. St Nicholas is:
• Well connected to the A48 strategic highway network.
• Served by bus routes within close proximity to the site.
• Within commuting distance of Cardiff and Cowbridge.
• A sustainable and established residential community.

Land adjoining The Spinney, St Nicholas (Site Ref: 460) represents a contained and sustainable opportunity that naturally rounds off the existing settlement boundary. The site encloses the envelope of development without encroaching into open countryside or extending beyond the established line of built form. It is well related to existing services and infrastructure and is capable of accommodating a modest allocation consistent with the scale and character of the village.

A proportionate allocation at this location would align with the stated objectives of supporting rural communities, enabling a mix of market and affordable housing, and providing genuine choice within Minor Rural Settlements. The continued absence of such allocations undermines the internal consistency of the spatial strategy.
Furthermore, the strategy places substantial emphasis on rail-based corridors. Whilst development near rail infrastructure is supported in principle, sustainable growth should not be exclusively rail-led. Strategic highway connectivity and bus accessibility also represent legitimate and sustainable locational advantages.

The complete absence of allocations in Minor Rural Settlements creates an imbalance in distribution and limits housing choice. A modest allocation at The Spinney would represent proportionate growth consistent with the scale and character of the settlement.
HG4 – Affordable Housing Allocations

It is recognised that Policy HG4 does allocate development within some Minor Rural Settlements, but in the context of them being affordable housing led sites where there will be a requirement for the provision of a minimum 50% affordable housing to meet the affordable housing needs of the local community. Mr Fairweather has no objection in principle to

this but does object to the fact that there is no development in St Nicholas (despite it being sustainably located on the A48).

Furthermore, The Spinney, St Nicholas (Site Ref: 460) proposes a 40% affordable housing provision which accords with Policy SP8 of the Deposit Plan. Should the Authority consider that the site is suitable for allocation under Policy HG4 then the provision can be amended to 50% to accord with the policy.

Candidate Site Response: The Spinney, St Nicholas (Site Ref: 460)
From a review of the Background Paper (BP18 a) - Candidate Site Assessment at Preferred Strategy Stage, we are aware that the candidate site The Spinney, St Nicholas (Site Ref: 460) has not progressed beyond Stage 2: Detailed Site Assessment: Site Characteristics and Physical Constraints.

The justification provided states that 'The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area'. Whilst this is disputed and it is considered that the site should have progressed, it is important to highlight that of all the Candidate Sites within St Nicholas, The Spinney has the least issues raised.

Other sites within the assessment raised concerns regarding Best and Most Versatile Land, intrusion into the open countryside and the loss of a sites identified as providing important views. Ultimately, Site Ref: 460, is clearly the most appropriate site for any development within St Nicholas and with limited constraints raised.
Turning to the reasons for not taking the site forward, the following is reiterated in the context of the impact on the character and setting of the Conservation Area.

Conservation Area Impact
St Nicholas is described in the Conservation Area Appraisal and Management Plan as 'a low density, linear village located on the A48' and the candidate site is located towards the west of the village and lies partially within the current Conservation Area boundary. The Authority will be aware that the Conservation Area has been amended over the years to its current illogical designation regarding the Paddock area, similar to that of the Settlement Boundary.

The development of the Candidate Site is a clearly a logical and sensible infill development, which would have limited impact upon the Conservation Area. The majority of the site is already hidden from the A48 via mature vegetation and existing boundary features, and any proposed development would maintain this approach and minimise the visual appearance on the Conservation Area.
Listed buildings and other historic buildings of special interest are identified in the Conservation Area Appraisal as 'County Treasures'. These are situated at the heart of the Conservation Area. The buildings and their settings establish a scale and density for the historic area of the village to the south of St Nicholas' Church.

More modern development, away from the centre of the village at Ger-y-Llan to the northeast, Dyffryn Close to the southeast and Old Rectory Drive to the west are suburban in character with larger houses and generous gardens. These are all excluded from the Conservation Area and represent development at a lower density than the historic core of the village.

Whilst only a part of the Candidate Site is located within the Conservation Area, it has to be seen in the context of an appropriate infill site that links the southern part of the village with the more modern suburban type of development at Old Rectory Drive to the west. More significantly, the site provides an opportunity for a development to make a positive contribution to the character and appearance of the Conservation Area as well as respect or enhance the special architectural or historic interest.

This can be achieved by providing a new front boundary to the site and houses with gardens, of the type identified in the Conservation Area Appraisal and Management Plan that help define the character of the village. Whilst the Candidate Site extends to the A48, this is to allow the appropriate minimal access junction, whilst the majority of the generous grass verge will be retained, meaning that development will be clearly set back a considerable distance from the road and the opposite pavement.

Thus, the development will be totally screened when travelling along the A48 and is therefore not considered to affect the views to the north of the site. The development will complement and enhance the character of the rural and built environment surrounding the site.
In line with the objectives of the St Nicholas Conservation Appraisal and Management Plan, the boundary treatments proposed will be sympathetic and in keeping with the surrounding area, such that they do not detract from the historic assets and desired lines of view. Again, whilst detailed design has not yet been progressed, any boundary treatments proposed will avoid the use of stained close boarded timber fencing, over-elaborate modern metal railings and gates. It is reiterated that the building line for the front of the development will not encroach any further forward that the existing boundary and will be designed to be innkeeping and not detract from the existing character of the Conservation Area. Moreover, the layout of the site has been designed in such a way that the spaciousness and green infrastructure is retained and enhanced from a redundant Paddock.

Furthermore, the characteristics that give the Conservation Area its special interest, as identified in the Conservation Area Appraisal and Management Plan have been used as references for the design of the illustrative site layout.

The proposal is to use local materials and design details designed to preserve or enhance the special interest of the Conservation Area. Limestone laid as rubble external walling, slate roofs and roadside walls of varying sizes predominate. More modern houses in the area are rendered and painted white. This, according to the Conservation Area Appraisal gives 'some cohesiveness [to the area] despite their modern details'.

Elsewhere in the appraisal the village is described as having a 'rural character', a character that is reinforced by the existence of mature trees, singularly or in groups and simple pavements with narrow stone curves. The use of modern railings or timber fences are considered to be detrimental to the historic character of the conservation area.

Given the sites relationship with the Conservation Area, the proposal has been designed in to ensure that the development endeavours to protect, preserve and enhance the character of the area.

The site layout has been designed to avoid having the appearance of a suburban estate by providing a range of house types on plots that vary in size thereby maintaining the open structure of the conservation area as described. Furthermore, the existing boundaries to the east and west, which are subject to TPOs, will be retained and enhanced and not detract from the character of the Conservation Area.

The site marks a transition point between the western end of the linear historic core of the village and the lower density development at Old Rectory Drive.
The landscape proposals have been designed to include sustainable drainage, and the tree planting reflects the isolated trees or groups of trees referred to in the Conservation Area Appraisal as significant areas of character.

The illustrative site layout represents an appropriate scale of development and an efficient use of land and as such the proposed development will not have any detrimental impact upon the Conservation Area.
Deposit Plan Amendments
Settlement Boundary

Given the above and the further assessment below, the strong preference would be for the site to be allocated for residential development within St Nicholas. This would form a logical amendment to the Settlement Boundary to include the western parcel (former Paddock) of Candidate Site - The Spinney, St Nicholas (Site Ref: 460). The current Settlement Boundary is illogical as the site is surrounded by development on 3 boundaries and the simple rounding off along the southern boundary would allow for an appropriate windfall infill development.
Conservation Area

Given the above then it is considered that the Conservation Area boundary would need to be amended to reflect the allocation of the site.
These amendments would be required to the Deposit Proposals Map.

Site Assessment
The site was promoted through the Candidate Site process and assessed at Preferred Strategy stage. However, it is not allocated within the Deposit Plan and thus was not subject to updated reassessment as part of this stage of plan preparation.

For completeness, and in order to clearly demonstrate the limited and proportionate nature of the site's constraints, the previous site assessment summary table is reproduced below. This is included to highlight that the site performs favourably in sustainability and deliverability terms, and that the matters previously cited as constraints are capable of mitigation through design.

A table comparing an updated site assessment prepared by Boyer against the Council's assessment has been provided.

This representation, submitted on behalf of Mr Fairweather in response to the current Vale of Glamorgan Council Replacement Local Development Plan (RLDP) 2021–2036 Deposit Plan Consultation, maintains that Land adjoining The Spinney, St Nicholas (Site Ref: 460) represents a logical, sustainable and deliverable parcel that should be allocated as a suitable and viable residential site within the RLDP.

Significant concern remains regarding the absence of residential allocations within Minor Rural Settlements, particularly St Nicholas, and the continued reliance on a limited flexibility allowance under Policy HG1. An increased flexibility margin of up to 15% would necessitate the identification of additional sustainable and deliverable sites. Such growth should be directed, in part, toward appropriate locations within Minor Rural Settlements to ensure a genuine range and choice of housing and to support rural community sustainability.

It is further noted that the site performs favourably in the Council's Candidate Site Assessment, with limited constraints identified. The matters previously raised, including Conservation Area considerations, are capable of sensitive mitigation through design and have been subject to detailed review. There is no substantive evidence demonstrating that the site is unsuitable for development.

Accordingly, the site is considered to represent a suitable, available and achievable allocation capable of contributing to the housing requirement, supporting affordable housing delivery, and reinforcing the spatial objectives of the Plan.

The Deposit Plan should therefore be amended to allocate Land adjoining The Spinney, St Nicholas (Site Ref: 460), or alternatively identify it as a reserve or flexibility site, in order to ensure the Plan is justified, effective and deliverable.

Change suggested by respondent:

Policy SP6 should therefore be amended to increase the flexibility margin to up to 15%, with consequential allocation of additional small and medium-sized sites.

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/397

6821 Object

Document Element: SP6 - HOUSING REQUIREMENT, Table 3: Spatial

Respondent: Mr Ian Fairweather [1225]

Agent: Boyer Planning

Summary:

The delivery of housing allocations is incumbent upon a number of larger strategic sites, and that to allow a greater range and choice then smaller allocations in the Minor Rural Settlements. Only 161 units are proposed on smaller allocated sites, equating to approximately 7% of newly allocated supply. In the context of the above, there remains significant concern that the spatial strategy continues to exclude allocations within Minor Rural Settlements, including St Nicholas.

The Plan recognises that Minor Rural Settlements provide an important range of services and facilities and play a functional role in meeting the needs of residents within rural areas. It further acknowledges that it is essential for the LDP to balance growth in a way that supports rural communities. Whilst general market housing is described as being limited to infill opportunities, the Plan also recognises that enabling an element of open market housing provides opportunities for the delivery of affordable housing and helps sustain rural communities.
There is therefore a clear disconnect between the identified role and function of settlements such as St Nicholas and the absence of any allocated sites (excluding the affordable led schemes under Policy HG4) capable of delivering an appropriate range and choice of dwellings. The strategy effectively restricts development to windfall and infill, without positively identifying opportunities that would logically consolidate and strengthen the settlement.
This approach is inconsistent with the settlement's accessibility and functional role.

The complete absence of allocations in Minor Rural Settlements creates an imbalance in distribution and limits housing choice.

Full text:

The Spinney, St Nicholas (Site Ref: 460)
Boyer have prepared the following representation on behalf of Mr Fairweather in response to the current Vale of Glamorgan Replacement Local Development Plan (RLDP) 2021-2036 Deposit Plan Consultation.

A summary of our main representations is as follows:
• Significant concern is raised regarding the lack of residential allocations within the Minor Rural Settlements, in particular St Nicholas.
• Concern regarding the overall housing requirement and the need for an increased flexibility allowance.
• Questions asked regarding the spatial distribution and the lack of other allocations to provide a range and choice of housing.
• Confirmation of the limited constraints for The Spinney, St Nicholas (Site Ref: 460).
• Review of the Candidate Site Assessment; and
• Need to review the Settlement Boundary of St Nicholas.

SP1: Sustainable Growth Strategy
Whilst Policy SP1 outlines the housing delivery requirement (addressed under the response to SP6), the main concern for Mr Fairweather is the proposed primary focus of housing growth within the Vale being within the Strategic Growth Area. Whilst it is understood and supported by Mr Fairweather that new housing developments would be concentrated in locations which are served by existing public transport routes and provide the opportunity to enhance sustainable transport connectivity, it is shortsighted to concentrate this growth specifically along the railway line. The justification being that those settlements identified as being 'Outside of the Strategic Growth Area' – including St Nicholas, are equally as important as those within. St Nicholas is a sustainable location and located on an important public transport route (A48) and is well served by bus transport.

The principle of locating development at sustainable settlement is supported, however Mr Fairweather considered that limiting development at suitable settlements outside the Strategic Growth Area is not the correct approach and that greater flexibility is required to deliver the housing need. Currently under Policies HG1 and HG4, the only allocations in any Minor Rural Settlements amount to 122 dwellings in total (excluding any from St Nicholas). This also needs to be considered in the context of the 1,303 dwellings expected from large and small windfall developments. Clearly there is a requirement to provide further allocations in sustainable Minor Rural settlements identified as being 'Outside of the

Strategic Growth Area' – namely St Nicholas.

In context of above, Mr Fairweather strongly recommends that appropriate consideration is given to the widening of the Strategic Growth Areas to include St Nicholas as a sustainable settlement which is capable of accommodating a new allocation at The Spinney (Site Ref: 460).

SP2: Settlement Hierarchy
Mr Fairweather previously supported the identification of St Nicholas as a Minor Rural Settlement and acknowledged its capacity to accommodate proportionate and sustainable growth, particularly given its accessibility and relationship with Cardiff to the east and access to Bridgend to the West. The Deposit Plan retains St Nicholas within the Minor Rural Settlement tier, however, does confirm that the settlement is outside the Strategic Growth Area.

Whilst the overarching principle of directing growth to the most sustainable settlements is supported, the Plan does not clearly demonstrate why settlements that are well connected and functionally related to larger centres, such as St Nicholas, should be subject to such constrained growth.

In this context, Mr Fairweather highlights Paragraph 3.10 which indicates that Minor Rural Settlements provide an 'important range of services and facilities that play a functional role in meeting some of the basic needs of residents within rural areas, reducing the need to travel'.
Building upon this, Policy SP2 does highlight that 'Minor Rural Settlements identified will be limited to the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments'.

Furthermore, the supporting text to Policy SP2 (Paragraph 6.17) confirms that 'those settlements that are considered to have sufficient population, services, and facilities to accommodate small scale growth without it having a detrimental impact on their existing character and local environment'.

This all buildings upon the identified importance of Minor Rural Settlements within the Preferred Strategy which outlined in Paragraph 6.50 that it is 'essential for the LDP to balance the growth in a way that supports the need of rural communities' and whilst it is evident that within these settlements 'general market housing will be limited to opportunities including infill' (Paragraph 6.51), the enabling of an element of 'open market housing will provide opportunities for the delivery of affordable housing reflecting the aspirations of rural communities to sustain their housing needs' (Paragraph 6.51). This importance of Minor Rural Settlements needs to be carried more strongly forward in the Deposit Plan.

Moreover, the evidence base does not sufficiently justify the degree of restriction now applied, nor does it explain why proportionate additional growth in appropriate Minor Rural Settlements would undermine the spatial strategy. As drafted, the policy risks limiting flexibility in the distribution of housing across the Vale. Accordingly, it is considered that the approach to St Nicholas under Policy SP2 is not justified.

Clearly there continues to be a disconnect between the identified role and function of St Nicholas, which is supported, and the actual ability to deliver the appropriate range and choice of dwellings in the rural settlements. For example, The Spinney, St Nicholas (Site Ref: 460) is considered to naturally round-off the existing boundary, enclosing the envelope of development, without encroaching or sprawling beyond the existing line of built form, in a sustainable location which can accommodate an appropriate allocation.

SP6: Housing Requirement
As per Mr Fairweather's previous comments to the Preferred Strategy, the concerns regarding a need for a higher housing level and the need for development to be appropriate placed in sustainable allocations in a settlement in which people want to live is still relevant.

Currently Policy SP6 establishes the overall housing requirement and applies a 10% flexibility allowance. The Policy suggests that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes and this will be delivered by:
• 3,837 dwellings from the existing land supply
• 3,520 dwellings on allocated sites
• 1,303 dwellings from large and small windfall developments

As per previous representations, Mr Fairweather considers that it's important to take account of recent guidance provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan. For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

More recently in Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery.
Applying the same approach to other current Local Development Plans, it is evident that a flexible housing allowance above the current 10% threshold will be required. Having reviewed the Council's evidence base Mr Fairweather considered that a minimum allowance of 15% would be reflective of the County's growth aspirations and would seek an additional circa 400 dwellings (equating to a housing requirement of 9,074 dwellings inclusive of the 15% flexibility).

To accommodate this increased in flexibility allowance and over all housing numbers, it should be outlined that smaller sites typically deliver more quickly, are less infrastructure-dependent, and increase build-out rates through diversification. The Spinney represents precisely the type of deliverable site that should form part of an enhanced flexibility allowance.

Policy SP6 should therefore be amended to increase the flexibility margin to up to 15%, with consequential allocation of additional small and medium-sized sites.
HG1: Housing Allocations Table 3 spatial distribution
Mr Fairweather does not comment on any of the proposed housing allocations, however, does highlight that the delivery in incumbent upon a number of larger strategic sites, and that to allow a greater range and choice then smaller allocations in the Minor Rural Settlements. Only 161 units are proposed on smaller allocated sites, equating to approximately 7% of newly allocated supply.
In the context of the above, there remains significant concern that the spatial strategy continues to exclude allocations within Minor Rural Settlements, including St Nicholas.

The Plan recognises that Minor Rural Settlements provide an important range of services and facilities and play a functional role in meeting the needs of residents within rural areas. It further acknowledges that it is essential for the LDP to balance growth in a way that supports rural communities. Whilst general market housing is described as being limited to infill opportunities, the Plan also recognises that enabling an element of open market housing provides opportunities for the delivery of affordable housing and helps sustain rural communities.

There is therefore a clear disconnect between the identified role and function of settlements such as St Nicholas and the absence of any allocated sites (excluding the affordable led schemes under Policy HG4) capable of delivering an appropriate range and choice of dwellings. The strategy effectively restricts development to windfall and infill, without positively identifying opportunities that would logically consolidate and strengthen the settlement.

This approach is inconsistent with the settlement's accessibility and functional role. St Nicholas is:
• Well connected to the A48 strategic highway network.
• Served by bus routes within close proximity to the site.
• Within commuting distance of Cardiff and Cowbridge.
• A sustainable and established residential community.

Land adjoining The Spinney, St Nicholas (Site Ref: 460) represents a contained and sustainable opportunity that naturally rounds off the existing settlement boundary. The site encloses the envelope of development without encroaching into open countryside or extending beyond the established line of built form. It is well related to existing services and infrastructure and is capable of accommodating a modest allocation consistent with the scale and character of the village.

A proportionate allocation at this location would align with the stated objectives of supporting rural communities, enabling a mix of market and affordable housing, and providing genuine choice within Minor Rural Settlements. The continued absence of such allocations undermines the internal consistency of the spatial strategy.
Furthermore, the strategy places substantial emphasis on rail-based corridors. Whilst development near rail infrastructure is supported in principle, sustainable growth should not be exclusively rail-led. Strategic highway connectivity and bus accessibility also represent legitimate and sustainable locational advantages.

The complete absence of allocations in Minor Rural Settlements creates an imbalance in distribution and limits housing choice. A modest allocation at The Spinney would represent proportionate growth consistent with the scale and character of the settlement.
HG4 – Affordable Housing Allocations

It is recognised that Policy HG4 does allocate development within some Minor Rural Settlements, but in the context of them being affordable housing led sites where there will be a requirement for the provision of a minimum 50% affordable housing to meet the affordable housing needs of the local community. Mr Fairweather has no objection in principle to this but does object to the fact that there is no development in St Nicholas (despite it being sustainably located on the A48).

Furthermore, The Spinney, St Nicholas (Site Ref: 460) proposes a 40% affordable housing provision which accords with Policy SP8 of the Deposit Plan. Should the Authority consider that the site is suitable for allocation under Policy HG4 then the provision can be amended to 50% to accord with the policy.

Candidate Site Response: The Spinney, St Nicholas (Site Ref: 460)
From a review of the Background Paper (BP18 a) - Candidate Site Assessment at Preferred Strategy Stage, we are aware that the candidate site The Spinney, St Nicholas (Site Ref: 460) has not progressed beyond Stage 2: Detailed Site Assessment: Site Characteristics and Physical Constraints.

The justification provided states that 'The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area'. Whilst this is disputed and it is considered that the site should have progressed, it is important to highlight that of all the Candidate Sites within St Nicholas, The Spinney has the least issues raised.

Other sites within the assessment raised concerns regarding Best and Most Versatile Land, intrusion into the open countryside and the loss of a sites identified as providing important views. Ultimately, Site Ref: 460, is clearly the most appropriate site for any development within St Nicholas and with limited constraints raised.
Turning to the reasons for not taking the site forward, the following is reiterated in the context of the impact on the character and setting of the Conservation Area.

Conservation Area Impact
St Nicholas is described in the Conservation Area Appraisal and Management Plan as 'a low density, linear village located on the A48' and the candidate site is located towards the west of the village and lies partially within the current Conservation Area boundary. The Authority will be aware that the Conservation Area has been amended over the years to its current illogical designation regarding the Paddock area, similar to that of the Settlement Boundary.

The development of the Candidate Site is a clearly a logical and sensible infill development, which would have limited impact upon the Conservation Area. The majority of the site is already hidden from the A48 via mature vegetation and existing boundary features, and any proposed development would maintain this approach and minimise the visual appearance on the Conservation Area.
Listed buildings and other historic buildings of special interest are identified in the Conservation Area Appraisal as 'County Treasures'. These are situated at the heart of the Conservation Area. The buildings and their settings establish a scale and density for the historic area of the village to the south of St Nicholas' Church.

More modern development, away from the centre of the village at Ger-y-Llan to the northeast, Dyffryn Close to the southeast and Old Rectory Drive to the west are suburban in character with larger houses and generous gardens. These are all excluded from the Conservation Area and represent development at a lower density than the historic core of the village.

Whilst only a part of the Candidate Site is located within the Conservation Area, it has to be seen in the context of an appropriate infill site that links the southern part of the village with the more modern suburban type of development at Old Rectory Drive to the west. More significantly, the site provides an opportunity for a development to make a positive contribution to the character and appearance of the Conservation Area as well as respect or enhance the special architectural or historic interest.

This can be achieved by providing a new front boundary to the site and houses with gardens, of the type identified in the Conservation Area Appraisal and Management Plan that help define the character of the village. Whilst the Candidate Site extends to the A48, this is to allow the appropriate minimal access junction, whilst the majority of the generous grass verge will be retained, meaning that development will be clearly set back a considerable distance from the road and the opposite pavement.

Thus, the development will be totally screened when travelling along the A48 and is therefore not considered to affect the views to the north of the site. The development will complement and enhance the character of the rural and built environment surrounding the site.
In line with the objectives of the St Nicholas Conservation Appraisal and Management Plan, the boundary treatments proposed will be sympathetic and in keeping with the surrounding area, such that they do not detract from the historic assets and desired lines of view. Again, whilst detailed design has not yet been progressed, any boundary treatments proposed will avoid the use of stained close boarded timber fencing, over-elaborate modern metal railings and gates. It is reiterated that the building line for the front of the development will not encroach any further forward that the existing boundary and will be designed to be innkeeping and not detract from the existing character of the Conservation Area. Moreover, the layout of the site has been designed in such a way that the spaciousness and green infrastructure is retained and enhanced from a redundant Paddock.

Furthermore, the characteristics that give the Conservation Area its special interest, as identified in the Conservation Area Appraisal and Management Plan have been used as references for the design of the illustrative site layout.

The proposal is to use local materials and design details designed to preserve or enhance the special interest of the Conservation Area. Limestone laid as rubble external walling, slate roofs and roadside walls of varying sizes predominate. More modern houses in the area are rendered and painted white. This, according to the Conservation Area Appraisal gives 'some cohesiveness [to the area] despite their modern details'.

Elsewhere in the appraisal the village is described as having a 'rural character', a character that is reinforced by the

existence of mature trees, singularly or in groups and simple pavements with narrow stone curves. The use of modern railings or timber fences are considered to be detrimental to the historic character of the conservation area.

Given the sites relationship with the Conservation Area, the proposal has been designed in to ensure that the development endeavours to protect, preserve and enhance the character of the area.

The site layout has been designed to avoid having the appearance of a suburban estate by providing a range of house types on plots that vary in size thereby maintaining the open structure of the conservation area as described. Furthermore, the existing boundaries to the east and west, which are subject to TPOs, will be retained and enhanced and not detract from the character of the Conservation Area.

The site marks a transition point between the western end of the linear historic core of the village and the lower density development at Old Rectory Drive.
The landscape proposals have been designed to include sustainable drainage, and the tree planting reflects the isolated trees or groups of trees referred to in the Conservation Area Appraisal as significant areas of character.

The illustrative site layout represents an appropriate scale of development and an efficient use of land and as such the proposed development will not have any detrimental impact upon the Conservation Area.
Deposit Plan Amendments
Settlement Boundary

Given the above and the further assessment below, the strong preference would be for the site to be allocated for residential development within St Nicholas. This would form a logical amendment to the Settlement Boundary to include the western parcel (former Paddock) of Candidate Site - The Spinney, St Nicholas (Site Ref: 460). The current Settlement Boundary is illogical as the site is surrounded by development on 3 boundaries and the simple rounding off along the southern boundary would allow for an appropriate windfall infill development.
Conservation Area

Given the above then it is considered that the Conservation Area boundary would need to be amended to reflect the allocation of the site.
These amendments would be required to the Deposit Proposals Map.

Site Assessment
The site was promoted through the Candidate Site process and assessed at Preferred Strategy stage. However, it is not allocated within the Deposit Plan and thus was not subject to updated reassessment as part of this stage of plan preparation.

For completeness, and in order to clearly demonstrate the limited and proportionate nature of the site's constraints, the previous site assessment summary table is reproduced below. This is included to highlight that the site performs favourably in sustainability and deliverability terms, and that the matters previously cited as constraints are capable of mitigation through design.

A table comparing an updated site assessment prepared by Boyer against the Council's assessment has been provided.

This representation, submitted on behalf of Mr Fairweather in response to the current Vale of Glamorgan Council Replacement Local Development Plan (RLDP) 2021–2036 Deposit Plan Consultation, maintains that Land adjoining The Spinney, St Nicholas (Site Ref: 460) represents a logical, sustainable and deliverable parcel that should be allocated as a suitable and viable residential site within the RLDP.

Significant concern remains regarding the absence of residential allocations within Minor Rural Settlements, particularly St Nicholas, and the continued reliance on a limited flexibility allowance under Policy HG1. An increased flexibility margin of up to 15% would necessitate the identification of additional sustainable and deliverable sites. Such growth should be directed, in part, toward appropriate locations within Minor Rural Settlements to ensure a genuine range and choice of housing and to support rural community sustainability.

It is further noted that the site performs favourably in the Council's Candidate Site Assessment, with limited constraints identified. The matters previously raised, including Conservation Area considerations, are capable of sensitive mitigation through design and have been subject to detailed review. There is no substantive evidence demonstrating that the site is unsuitable for development.

Accordingly, the site is considered to represent a suitable, available and achievable allocation capable of contributing to the housing requirement, supporting affordable housing delivery, and reinforcing the spatial objectives of the Plan.
The Deposit Plan should therefore be amended to allocate Land adjoining The Spinney, St Nicholas (Site Ref: 460), or alternatively identify it as a reserve or flexibility site, in order to ensure the Plan is justified, effective and deliverable.

Change suggested by respondent:

A modest allocation at St Nicholas would represent proportionate growth consistent with the scale and character of the settlement.

Sound: Not specified

Attachments:
Email representation redacted - https://valeofglamorgan.oc2.uk/a/397

6853 Object

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Taylor Wimpey [386]
Agent: Savills

Summary:
Taylor Wimpey maintains that the current housing requirement in the Deposit Revised Local Development Plan (RLDP) is fundamentally undervalued. By relying on a ten-year dwelling-led scenario, the methodology incorporates a period of suppressed supply caused by the delayed adoption of the previous plan. Taylor Wimpey argues that the council must instead align with Planning Policy Wales (PPW) by utilising the latest 2022-based household projections. This shift would increase the housing requirement from the proposed 7,587 units to 9,623 units to accurately reflect demographic evidence.

Regarding the flexibility allowance, Taylor Wimpey asserts that the proposed 10% buffer is insufficient. Evidence from the Annual Monitoring Report 2024-2025 reveals a 20.7% shortfall in completions against previous targets. Consequently, the firm recommends increasing the flexibility allowance to 20%, mirroring recent adjustments made by neighboring authorities like Bridgend, to ensure the housing requirement is actually met despite potential site non-delivery.

Taylor Wimpey also raises significant concerns regarding the reliability of the current land bank and windfall allowances. They suggest a 20% non-delivery discount should be applied to sites with planning permission to account for viability, site constraints, and landowner intentions. Similarly, the firm argues that windfall projections are overly optimistic; following the precedent set by Cardiff Council, they recommend reducing the windfall allowance to 75% of the ten-year average as easily developable sites become increasingly scarce.

Furthermore, Taylor Wimpey disputes the inclusion of certain "rolled forward" sites from the previous plan, specifically land at Pencoedtre Lane and Eglwys Brewis Road. These sites, totaling 370 homes, have failed to deliver despite long-standing policy support due to viability and technical constraints. Taylor Wimpey recommends their removal from the supply tables to maintain a realistic outlook on deliverability.

In conclusion, Taylor Wimpey suggests that the combination of a higher housing requirement, an increased flexibility buffer, and more cautious supply assumptions creates a significant deficit. They calculate that the RLDP must identify new allocations for an additional 3,872 homes to ensure a robust and sound development strategy for the region.

Full text:
1. Introduction

1.1.1 Savills is instructed by Taylor Wimpey PLC ('Taylor Wimpey') to respond to the consultation on the Deposit Plan as part of the preparation of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').

1.1.2 The submission is made in the context of Taylor Wimpey's position as the promoter of Site ID 376 (Land West of Swanbridge Road, Phase 3). The site is being promoted for a residential development comprising of 260 homes.

1.1.3 Taylor Wimpey is one of the UK's leading national housebuilders, with extensive experience in delivering high-quality residential developments across a wide range of local authority areas. The company has an established presence within the VoG area. Taylor Wimpey is in the process of delivering Phase 1 of the site with development of Phase 2 close to commencing to dovetail with the completion of Phase 1. Phase 3 would act as a logical extension to the site, effectively rounding off development in this part of Sully and dovetailing with Phase 2 which is anticipated to be completed in 2029.

1.1.4 The site was originally submitted as a candidate site as part of the Call for Candidate Sites stage in September 2022 by Taylor Wimpey. This was a comprehensive site submission demonstrating that the site was viable, deliverable and sustainable – the three tests for Candidate Sites to satisfy as set out in Paragraph 3.36 of the Development Plans Manual. The Candidate Site submission consisted of the following information:

• Archaeological Desk-based Assessment (prepared by RPS);
• Design Vision (prepared by Pegasus Group);
• Drainage Strategy & Flood Risk Assessment (prepared by Pheonix Design);
• Landscape Appraisal (prepared by Pegasus Group);
• Preliminary Ecological Appraisal (prepared by Soltys Brewster);
• High Level Viability Statement (prepared by Savills);
• Transport Technical Note (prepared by Vectos); and
• Supporting Statement (prepared by Savills).

1.1.5 Since then, and on behalf of Taylor Wimpey , Savills have also responded to the consultation on the Preferred Strategy in February 2024 as well as the Housing Growth in Barry consultation in July 2025 and the Housing Trajectory in October 2025.

1.1.6 This supporting statement is structured to initially comment on the approach taken by the VoG in assessing the Land West of Swanbridge Road, Phase 3 site before commenting on specific policies that are contained within the Deposit RLDP.

1.1.7 In general, Taylor Wimpey's position is that, at present, the Deposit RLDP is not sound but that it could be made sound through the amendments as suggested throughout this Statement.

2. Candidate Site Assessment Process and Integrated Sustainability Assessment
Introduction

2.1.1 Candidate sites are in essence assessed through two means – the Candidate Site Assessment Background Papers and the Integrated Sustainability Appraisal.

2.1.2 Taylor Wimpey's position is that both of these documents do not provide an adequate assessment of the Land West of Swanbridge Road, Phase 3 site.

2.1.3 Each is considered in turn below.

Candidate Site Assessment Process

2.1.4 All candidate sites have been assessed at Preferred Strategy stage (reported as Background Paper 18) and Deposit stage (reported as Background Paper 18a).

2.1.5 The reason for the Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site not being carried forward as part of these assessments was presented in Background Paper 18 at the time of publication of the Preferred Strategy with Backgropund Paper 18a providing no further site analysis. The reason for the site not progressing this stage of the Candidate Site assessment process is as follows:

"Development of the site would lead to a loss of the Best and Most Versatile Grade 3a agricultural land contrary to national policy."

2.1.6 Whilst parts of the site do constitute Best and Most Versatile (BMV) land, Taylor Wimpey's position is that there are compelling reasons relating to the site's context and how it is utilised that mean a more nuanced position needs to be taken. Without such nuance, the RLDP risks not allocating a site that, whilst perhaps containing BMV, is otherwise suitable for development and more suitable for development then sites that the Deposit RLDP proposes to instead allocate.

2.1.7 Included at Appendix A, and included as part of Taylor Wimpey's representations on the Preferred Strategy and the Housing Growth in Barry consultations, is an Agricultural Assessment prepared by The Andersons Centre.

2.1.8 The key conclusions from this Assessment are that:

• The site is farmed by a tenant farmer whose main base is approximately 12km away which presents logistical and practical challenges. These challenges are exacerbated by the lack of farm buildings and the fact that there is no mains electricity;

• The site forms part of a wider 230 acre farm and so the cessation of agricultural practices on this parcel will not, by virtue of its size, prejudice the continued farming of the wider land parcel;

• The tenant farmer farms approximately 3,000 acres of land and so the loss of the ability to farm this parcel will have a negligible impact on the continuation of their agricultural operations;

• The site is bound on two sides by existing or permitted housing, on a third boundary by a railway line, and on its eastern boundary by a road; and

• Farming of the land does not support a high level of employment and if the land was lost for development, 0.15 of a full time labour unit's equivalent work would be lost.

2.1.9 Taking the above together, the conclusion needs to be reached that the site's size and context presents challenges for farming and that the development of Phase 2 by Taylor Wimpey has the potential to exacerbate these challenges. Aligned to this, the level of employment that the farming of the site supports is negligible and the cessation of farming of this particular parcel of land will not materially impact either the continued farming operations of the wider farm that the land sits apart of or the tenant farmer that farms the land.

Integrated Sustainability Appraisal

2.1.10 The Initial Integrated Sustainability Appraisal undertaken at Preferred Strategy stage provides a GIS based appraisal of all sites against 17 objectives. Inherently the Initial Integrated Sustainability Appraisal can be a bit of a blunt tool but Taylor Wimpey's position is that the site performs better against a substantial number of the 17 objectives than the current assessment.

2.1.11 Included at Appendix B is an assessment undertaken by Taylor Wimpey which provides commentary against certain objectives and suggests why the site performs considerably better than forecast in the Initial Integrated Sustainability Appraisal.

2.1.12 A summary of this is presented below:
Table 1 Summary of ISA and Suggested Taylor Wimpey Approach

2.1.13 Taylor Wimpey's position here is clear – the inadequacy of the Integrated Sustainability Appraisal as a tool for assessing candidate sites can only be appropriate where the Integrated Sustainability Appraisal is done correctly and considers the mitigation measures that a candidate site submission proposed to put in place. Without this, the Integrated Sustainability Appraisal risks a situation – as Taylor Wimpey suggest has been the case in Policy HG1 KS1 – where a Key Site is selected in favour of alternative sites that are better performing.

3. Deposit Plan

3.1 Introduction

3.1.1 The following section of this Statement comments on the relevant Key Themes, Strategic Objectives and draft Policy Framework forming part of the Deposit Plan Consultation.

3.1.2 The Policy Framework has been reviewed with comments provided on only those policies considered to be of most relevance to Land West of Swanbridge Road (Phase 3), Sully. The position on individual policies contained within the Deposit RLDP are summarised in the table below:

Table 2 Taylor Wimpey Policy Position

Relevant Policy Support or Object
SP1 Sustainable Growth Strategy - Object
SP2 Settlement Hierarchy - Support
SP 6 Housing Requirement - Object
HG1 Housing Allocations: HG1 KS1 – Land at North West Barry - Object
TR1 Transport Proposals: TR1(2) Active Travel Route Sully to Cosmeston - Support
TR1 Transport Proposals: TR1(6) Highway Improvement Works Weycock Cross Roundabout - Object
CC1 Residential Operational Net Zero Carbon Development - Object
CI1 Open Space Provision - Clarity required
DNP5 Environmental Protection - Object as currently worded

3.2 Key Themes and Strategic Objectives

Homes For All

3.2.1 As noted in paragraphs 3.17 and 3.18 of the Deposit Plan the VoG has the highest affordability ratio in Wales with average house prices 9.7 times the average workplace earnings compared to the Welsh average, giving rise to a significant need for affordable homes which is under significant pressure. This highlights the ever increasing need for sufficient high quality housing, which Taylor Wimpey are committed to provide and supply the mix, type and tenure of housing needed within the local authority's growing population.

Placemaking

3.2.2 Taylor Wimpey embed strong placemaking standards across their developments as detailed within their Placemaking Charter. Taylor Wimpey consider Land West of Swanbridge Road (Phase 3) to present an opportunity to provide a comprehensive residential development that is accessible and well-connected with the existing settlement of Sully and compliments the earlier phases of development. As demonstrated in the earlier phases of development, the Site offers a sustainable location for future growth with easy access to a range of services and facilities in Sully.

Protecting and Enhancing the Natural Environment

3.2.3 Taylor Wimpey support the VoG's commitment to protect and enhance the natural environment through the integration of green/blue infrastructure network and the sustainable management of resources within the VoG. However where Objective 5 seeks to safeguard land from inappropriate development, proposals must be subject to the relevant planning balance giving weight to the surrounding land use and appropriateness of safeguarding agricultural land that

would otherwise be unconstrained and considered suitable for development given the outstanding need for housing.

Promoting Active and Sustainable Travel Choices

3.2.4 Taylor Wimpey support the promotion of sustainable travel and active modes of transport, including the provision of designated active travel routes that improve the connectivity between primary and key settlements, such as the Sully to Cosmeston active travel route.

3.2.5 As demonstrated in the earlier phases of Land West of Swanbridge Road, Taylor Wimpey support the promotion of active travel within new developments and provide opportunities for residents to easily engage with active travel.

3.3 Policy Framework

Policy SP1 Sustainable Growth Strategy

3.3.1 Taylor Wimpey's comments on this policy relate to the sustainable growth strategy in so much as it relates to the spatial strategy rather than the housing requirement that the RLDP adopts with further comments on the housing requirement provided in connection to Policy SP6 (Housing Requirement).

3.3.2 Taylor Wimpey appreciate the need to balance the ten strategic objectives against the need for growth and protection of the VoG's natural and built environment, and strongly support the strategic objective to provide homes for all. Taylor Wimpey maintain their position on the proposed growth strategy that has been established within earlier consultation responses submitted throughout the RLDP process, including the most recent consultation on 'Growth Options in Barry'.

3.3.3 Taylor Wimpey consider that to date the growth strategy has placed disproportionate emphasis on identifying an alternative site within Barry, rather than giving due consideration to potential sites in nearby high-performing settlements such as Sully. Taylor Wimpey therefore strongly encourage the VoG to widen the search for additional allocations beyond the administrative boundary of Barry Town Council and to consider locations that represent a logical and sustainable extension to neighbouring primary settlements that are located within the Strategic Growth Area, including Sully.

3.3.4 The six key elements of the Sustainable Growth Strategy are noted and Taylor Wimpey support a spatial strategy that locates major new development for the delivery of sustainable housing growth in appropriate locations, such as Sully, that are supported by the relevant infrastructure, services and facilities. Providing new homes within Phase 3 aligns with the Strategic Growth Area identified within the RLDP Strategy which forms the primary focus for housing growth.

3.3.5 Policy SPG1 continues to identify Sully as a location where new housing development will be concentrated, therefore establishing a principle of development for Phase 3 and help to further align the provision of new housing with the existing facilities of Sully, reducing the need to travel. Sully represents an inherently sustainable location for future growth and aligns well with the Sustainable Transport Oriented Growth Option. As identified in the Deposit RLDP, Sully is classified as a Primary Settlement and performs a complementary role to Barry as a key centre. Its position within the Strategic Growth Area further indicates that an appropriate level of development at Sully would be acceptable, with both existing housing delivery and the current allocation at Swanbridge Road supporting its established role.
3.3.6 With existing development ongoing to the north of the Site, at Phases 1 and 2 of Land West of Swanbridge Road, Phase 3 is considered to provide an appropriate level of growth in a sustainable location that would form a logical extension to existing allocations. The sustainability and suitability of Sully to accommodate residential development is reinforced by the allocation of 500 dwellings under Policy MG2(37) ('Land West of Swanbridge Road, Sully') on land directly north of the site promoted by Taylor Wimpey. The progression of this location into a phase 3 development would continue to strengthen Sully's function as a primary settlement and would constitute a logical and coherent extension to the existing built form.

Figure 1 Extract of Growth Strategy

3.3.7 Taylor Wimpey appreciate the aspirations of the Council to deliver housing to meet the identified future housing needs of the VoG and wider growth aspirations of the South East Wales Region at a strategic level. Taylor Wimpey support the revised strategy moving away from North East Barry, however maintain the position that this level of growth should be re-allocated to those locations that are most suitable for growth, including sustainable settlements outside of Barry. Growth should not be focuses solely on Barry.

Policy SP2 Settlement Hierarchy

3.3.8 Taylor Wimpey support the conclusions of the Settlement Appraisal Review Background Paper which identifies Sully as a Primary Settlement, reflecting its important role in providing a level of housing growth, in addition to key local services and facilities. Within this Background Paper, Sully is recognised for its vital role as a sustainable community, scoring highly across all key principles in demonstrating its sustainability by providing for the day-to-day needs of its residents. Taylor Wimpey concur with the supporting evidence which reinforces Sully's importance within the settlement hierarchy.

3.3.9 Whilst Draft Policy SP2 presents a 'broad distribution of development within the Strategic Growth Area..', serious concerns continue to be raised around the level of growth around Barry and the emphasis placed on it as the focus for future development. Taylor Wimpey do not dispute the identification of Barry as a Key Settlement, given its position as the largest town within the VoG, however believe Barry should not remain the sole focus for growth where there are opportunities available around primary settlements located within the Strategic Growth Area.

3.3.10 Put another way, it seems perverse for the Deposit RLDP to direct no new growth to a Primary Settlement within the identified Strategic Growth Area.

Policy SP 6 Housing Requirement

3.3.11 The purpose of this policy is to set the housing requirement and then identify the components of supply that are anticipated to meet this housing requirement. A number of Background Papers (nos. BP7, BP8, BP8A, ad BP9A) underpin the approach that is taken. Taylor Wimpey have a number of comments to make on the approach taken in this policy.

Housing Requirement

3.3.12 The approach taken in the Deposit RLDP, as with the Preferred Strategy beforehand, is for the housing requirement to make use of a 10 year dwelling-led scenario, an approach that reflects past completions and looks to extrapolate this forward over the lifetime of the RLDP.

3.3.13 Taylor Wimpey provided detailed commentary on the proposed housing requirement in their comments on the Preferred Strategy but note that Welsh Government have subsequently provided their comments on the Preferred Strategy raising no objection with the housing requirement proposed to be taken.

3.3.14 Taylor Wimpey's position though remains – if a dwelling-led scenario is to be used to determine the housing requirement then it needs to have a far shorter scenario length then 10 years as the first three years of the 10 year period selected were when supply was suppressed as a result of the current LDP not having been adopted.

3.3.15 That said, there is a clear contextual change since the Preferred Strategy was adopted, this being the publication of the 2022-based household projections have been published. Table 5 of Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections provides a comparison of the 2022-based projections with the 2018-based projections and the Deposit RLDP's housing requirement. A simplified version of this table is shown overleaf:

Table 3 RLDP Housing Requirement
Scenario Housing Requirement
RLDP 7,587
2018-based projections 6,214
2022-based projections 9,623

3.3.16 This is important as Paragraph 4.2.6 of PWW states that:

'The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans.'

3.3.17 The proposed approach of continuing to use the 10 year dwelling-led scenario, as a methodology, clearly does not do this.

3.3.18 The approach of using the 2022-based household projections would comply with the aspirations of PPW. Taylor Wimpey's position is that the commentary provided in the Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections for not using 2022-based projections is wholly inadequate and that these projections should be used.

Flexibility Allowance

3.3.19 Paragraph 5.58 of Edition 3 the Development Plans Manual (March 2020) makes it clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes the RLDP should plan for. This is in the interest of ensuring that sufficient housing is delivered in the event of some allocated sites either not delivering in their entirety or delivering less homes than anticipated. Paragraph 5.59 of the Manual clarifies that the extent of the flexibility allowance should be informed by local issues with 10% as a starting point (i.e. as the minimum).

3.3.20 The Adopted Local Development Plan (ALDP) applies a 10% flexibility allowance on top of the housing requirement for 9,460 homes so that provision is made for 10,408 homes.

3.3.21 Paragraph 1.2.34 of the Annual Monitoring Report 2024-2025 provides a comparison of the number of homes that

have been completed and the level of completions that the ALDP anticipates. This shows that 6,999 homes have been delivered up to 1st April 2025 against a cumulative dwelling target of 8,829 homes, representing a shortfall of 20.7%.

3.3.22 Taylor Wimpey's point here is that the ALDP's flexibility allowance of 10% is insufficient to ensure that the ALDP's housing requirement is actually being delivered. This is clear evidence that a higher flexibility allowance should be used for the RLDP. Although for different reasons, but following a direction from the Welsh Government Planning Inspector, Bridgend County Borough Council has increased its flexibility allowance to 20% and, it is considered that such a buffer is appropriate for the VoG's RLDP.

Non-Delivery Allowance on Land Bank

3.3.23 Line C of Table 2 of the Preferred Strategy relates to those sites that either benefit from planning permission or are subject to a resolution to grant planning permission subject to planning permission. Combined, these sites are identified as having capacity for 1,860 homes.

3.3.24 The current approach, which assumes that all other sites which are under construction or sites where there is either a planning permission in place or sites where there is a resolution to grant planning permission subject to the signing of a Section 106 agreement will be completed in full, causes concern for Taylor Wimpey.

3.3.25 There are multiple reasons why homes that benefit from either planning permission or a resolution to grant planning may not be delivered. These relate to viability, but also to specific site constraints and landowner intentions.

3.3.26 A point that is separate, but inherently linked, to the above is that often the capacity of a site for which reserved matters approval is sought is less than that permitted at outline stage. Requirements for SAB approval and the demonstration of a biodiversity net benefit, for example, reduce the capacity of a site at detailed design stage but are often not factored in at outline stage, particularly where the outline application is not progressed by a housebuilder.

3.3.27 Research undertaken by the Local Government Association for England (no such data is available for Wales) suggests that, between 2010/2011 and 2019/2020 a total of 2,782,300 dwelling were granted planning permission whilst there were only 1,627,730 completions. This means that during this period just 58.5% of those homes which were granted planning permission were completed.

3.3.28 Taylor Wimpey is not suggesting that applying a discount of 41.5% is necessarily correct and the above is both from England and a few years out of date but the need for a discount that relates specifically to Line C is very clear.

3.3.29 It's difficult to know what this figure should be but Taylor Wimpey suggest that a 20% figure is used to reflect the flexibility allowance.

Windfall Allowances

3.3.30 The approach taken in the Deposit RLDP is to assume that 1,303 homes will be delivered across Windfall Sites. This has been calculated on the basis of previous completion delivered as windfalls.

3.3.31 Taylor Wimpey's concern is that the delivery of homes on Windfall Sites inherently becomes more challenging over time as the easier to develop sites have been delivered and the buildings and land that hasn't been developed is subject to increasing levels of policy protection. The approach taken by Cardiff Council in their Deposit RLDP is to assume that 75% of the 10 year average Windfall Sites will be delivered and such an approach seems entirely appropriate in this case.

3.3.32 An Urban Capacity Study (October 2023) prepared by the VoG, seeks to corroborate this by identifying 2,627 homes that could be delivered across the VoG. Whilst the windfall allowances would be less than the suggested urban capacity, this shouldn't be seen as problematic or as a conflict as the purpose of the Urban Capacity Study is, as the name suggests, just to identify sites which may have capacity. It doesn't account for land ownership (and whether the land owners have aspirations to dispose of the site) or development viability. In addition, the approach taken to site capacity to is to assume a density based on site type but it does this without an appreciation of site constraints and is based on the gross rather than net area.

Rolled Forward Sites

3.3.33 Taylor Wimpey have concerns with the approach that is taken in Table 2 of the Deposit RLDP which identifies allocations for 959 homes that are to be rolled over from the ALDP to the RLDP.

3.3.34 Concerns are raised around two sites in particular - Land to the west of Pencoedtre Lane, Barry and Land between new Northern Access Road and Eglwys Brewis Road, These sites are allocated in the ALDP but have failed to be delivered. Given the longstanding period during which there has been clear policy support for development but no completions, it follows that there are serious concerns around the deliverability of these two sites which, together, are allocated for 370 homes.

3.3.35 The failure to deliver these dwellings is due to a number of factors which are detailed in Taylor Wimpey's Preferred Strategy consultation response, which questions whether these sites will deliver at all or at a significantly reduced capacity due to the following reasons:

■ Viability constraints;
■ Site specific constraints;
■ Landowner intentions;
■ Requirements for SAB approval; and
■ Biodiversity net benefit;

3.3.36 Whilst it is recognised that there may be policy support for the delivery of these two sites, there deliverability is clearly uncertain and they should be removed from Table 2.

Conclusion

3.3.37 The following table summarises the approach previously proposed in the Deposit RLDP and compares it to the amendments suggested by Taylor Wimpey in the preceding sections of this Statement.

Table 4 Deposit RLDP Housing Supply and Taylor Wimpey's Suggested Approach
Housing Supply - Deposit Plan (December 2025) - Taylor Wimpey Suggested Approach (March 2026)
Housing Requirement - 7,890 - 9,623
Flexibility Allowance - 10% - 20%
Flexibility Allowance – 770 - 1,925
Housing Requirement + Flexibility Allowance - 8,660 - 11,548
A – Completions - 1,747 - 1,747
B – Units Under Construction - 313 - 313
C and D- Units with Planning Permission Minus Non-Delivery Allowance - 1,777 1,488
Existing Supply - 3,827 - 3,548
E – Large Windfall Sites - 720 - 540
F – Small Windfall Sites - 583 - 438
E+ F Total Windfall Allowance - 1,303 - 978
RLDP Allocations - 3,520 - 3,150

3.3.38 The conclusion reached in Taylor Wimpey's analysis is that, as a result of both the suggested housing requirement and flexibility allowance combined with Taylor Wimpey's comments on the components of supply, the Deposit RLDP needs to find allocations to deliver a further 3,872 homes.

Policy HG1 KS1 – Land at North West Barry
3.3.39 Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. Taylor Wimpey has provided comments on the housing requirement that is set in the RLDP and the components of supply that are anticipated to meet it in the proceeding sections of this Statement.

3.3.40 As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.

3.3.41 There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.

3.3.42 Policy HG1 KS1 proposes to allocate the site known as 'Land at North West Barry'.

3.3.43 The proposed allocation of this site follows a consultation – entitled 'Housing Growth in Barry' - undertaken by the VoG in July 2025 which proposed to allocate three sites in Barry as an alternative to the North East Barry site that was identified as a Key Site in the Preferred Strategy but was considered to no longer be deliverable.

3.3.44 Taylor Wimpey responded as part of the 'Housing Growth in Barry' consultation, supporting the removal of North East Barry as a Key Site but raising serious concerns with the proposed allocation of 'Land at North West Barry' as an alternative.
3.3.45 These concerns remain and Taylor Wimpey strongly consider there need to be other alternative sites – such as Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) - within nearby settlements that perform better than the Land at North West Barry site and should be allocated for housing.
3.3.46 To support this conclusion, Taylor Wimpey has undertaken a review of the Integrated Sustainability Appraisal (ISA) which provides a scoring of different candidate sites against the 17 objectives as well as considering and

comparing the sustainability and accessibility of the two sites.

Integrated Sustainability Appraisal

3.3.47 The below table provides a comparison of how the Integrated Sustainability Appraisal scores Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) compared to the Land at North West Barry site. Two different comparisons are provided – one which compares the actual scoring in the ISA and a second which compares the two sites following Taylor Wimpey's suggested scoring which is included as Appendix A.

3.3.48 These tables clearly highlight where the subject site out performs North West Barry across numerous objectives.

Table 5 Comparison of Phase 3 Land West of Swanbridge Road (Site ID 376) and North West Barry (Site ID 490) ISA performance

3.3.49 From an initial review, the Integrated Sustainability Appraisal shows that Land West of Swanbridge significantly outperforms North West Barry in terms of the number of significantly positive scores '++' and the number of '—' scores. To this end the subject site provides clear advantages above and beyond North West Barry in terms of homes, health, and transport. As such Land West of Swanbridge is considered to have the capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge; The site is within 800m of a health service and an active travel route; and, The site is within close proximity (≤800m) to a railway station or bus stop, town/ retail centre and an active travel route. Taylor Wimpey consider this assessment should go further to recognise the associated benefits to the leisure than be provided by the site's development.

3.3.50 Following Taylor Wimpey's re-assessment of the site against the Integrated Sustainability Appraisal ISA objectives it is also considered to obtain notably more positive '+' scores than North West Barry. It is also worth noting that North West Barry has more unknown impacts than Land West of Swanbridge which introduces a level of uncertainty around its potential for further negative impacts. Moreover, North West Barry scores a significant number of negative impacts across the ISA, with the extension site obtaining double the amount than Land West of Swanbridge Road.

3.3.51 Taylor Wimpey's position is that it would be unsound to allocate a site that performs considerably poorer in the Integrated Sustainability Appraisal than a site that is not proposed to be allocated.

Accessibility and Sustainability

3.3.52 SLR Consulting have prepared an updated document demonstrating the Site's sustainability credentials and providing a detailed overview of existing and future active travel and public transport infrastructure. This is included as Appendix C.

3.3.53 As a starting point, it considers those services within Sully. In terms of local amenities, the population size of Sully, naturally benefits from a good range of local amenities and services, and therefore it is anticipated that a high proportion of future residents' day-to-day journeys would be contained within the village and undertaken via walking or cycling. The Walking Catchment Map prepared by SLR demonstrates this and illustrates services within walking distance from the Site.

3.3.54 The proposed development benefits from local existing and future / planned infrastructure which will help support travel by sustainable modes such as walking, cycling and public transport. The Site falls within the less than 15 minutes Public Transport Catchment for bus and rail services. The Site is supported by the existing bus network, connecting Sully with Barry, Penarth and Cardiff – the nearest bus stop approximately 400m from the centre of the site; Moreover the Site is within proximity to Cadoxton and Penarth railway stations which have regular services in each direction in addition to the existing walking and cycling infrastructure in and around Sully.

3.3.55 The future accessibility of the Site will be further enhanced through the ongoing and planned South Wales Metro improvements, future active travel routes and the proposed Sully to Penarth mixed use link. The below figure shows several newly proposed active travel routes running close to the site including a new walking / cycling route along Swanbridge Road. Planning applications are now being submitted to support the delivery of these new active travel links. In March 2025 a planning application was submitted proposing a new route between Palmerstown and Dinas Powys.

3.4 SLR have undertaken further assessment work comparing the sustainability credentials of Land West of Swanbridge Road to Land North West of Barry. Land North West of Barry, is separated from the existing built-up area by the B4266 Pontypridd Road where the eastern and southern boundaries abut residential properties. As such, the proposed access for all modes would be taken from the A4226 Port Road West. The A4226 and B4266 can be a barrier to the promotion of active travel in that they facilitate vehicular travel and do not provide an attractive environment for pedestrians.

3.5 Furthermore, Land North West of Barry is on the fringes of Barry and had few if any facilities within a 10 minute walk, other than bus stops. In comparison, Land West of Swanbridge Road in Sully benefits from its proximity to the High Street in Sully and the services there.

3.6 The below table demonstrates differences in accessibility to amenities between the two sites, where Land West of

Swanbridge Road presents a more favourable location for future development.

Table 6 Comparison of Local Facilities Between Land North West of Barry (Site ID 449) and Land West of Swanbridge Road (Phase 3) (Site ID 376)

3.7 Whilst the walking distance shown from Land North West of Barry to the nearest bus stop is slightly less than the Swanbridge Road Site, it should be noted that the bus services that can be accessed from Sully are more frequent and more direct than those which can be accessed from Land North West of Barry.

Conclusion

3.8 Taking the above together, the conclusion Taylor Wimepy reach is that their Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site performs more strongly than the Land North West of Barry site.

Policy TR1 Transport Proposals

3.9 The draft transport proposals contained within the Deposit RLDP have been reviewed with the following proposals considered to be pertinent to the Site and draft residential allocations.

TR 1 (2) Active Travel Route: Sully to Cosmeston

3.10 Taylor Wimpey support the designation of an active travel route connection the eastern side of Sully with Cosmeston in the north-east. Most notably the proposed route will pass Swanbridge Road which provides direct access to Land West of Swanbridge Road Site, with Phase 3 in close proximity to the travel route. The proposal would further enhance the accessibility and sustainability of the Site as a logical extension for residential development in Sully.

Figure 4 Extract of Deposit RLDP Proposals Map with Land West of Swanbridge Road (Phase 3) Identified

TR1 (6) Highway Improvement works: Weycock Cross Roundabout, Barry

3.11 Taylor Wimpey raise concerns around the proposed works at the Wyecock Cross Roundabout, compared to the other improvement works proposed. As noted in the Deposit RLDP, this roundabout forms a key connection within the wider strategic highway network and therefore of high importance for the local area and surrounding communities. The proposed options presented within the Deposit RLDP provide little certainty of the scope of works required with no preferred option identified. This raises concerns around the impacts of the highway improvements on the deliverability of the adjacent draft allocation of North West Barry. The same concerns arise when considering the roundabout improvement works in combination with the proposed access strategy contained within North West Barry's supporting information package. The proposed road widening measures (c.11m increase) required to make the draft allocation accessible would have a significant impact on the wider transport network at this strategic junction.

Policy CC1 (Residential Operational Net Zero Carbon Development)

3.12 The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) then setting out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.

3.13 As a starting point, Taylor Wimpey share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) is not appropriate. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this results to an uneven framework for housebuilders, significantly adding cost and reducing certainty.

3.14 The justification for exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.

3.15 There are two points to be made here:

3.16 Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage. This Written Ministerial Statement was subject to a judicial review which was dismissed with the position taken in it found to be legally sound.

3.17 Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it

is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations.

3.18 Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound.

3.19 Secondly, Taylor Wimpey have concerns with the approach that has been taken with regards to viability.

3.20 From Taylor Wimpey's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.

3.21 As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated.

3.22 Taylor Wimpey's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. Savills' experience is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.

3.23 Taylor Wimpey's other concern with this approach is that the figure assumed as being required to achieve the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is driven from a Cost Assessment report published in January 2024. With the Background Paper 9A Housing Land Supply and Housing Trajectory not forecasting first completion onsite until 2028/2029, there is likely to be a period of approximately five years from the establishment of the figure for delivering the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) and when the first units would be delivered onsite.

3.24 Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy CI1 (Open Space Provision)

3.25 This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.

3.26 Taylor Wimpey note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.

3.27 Taylor Wimpey is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter, Policy DNP5 Environmental Protection

3.28 Taylor Wimpey consider the inclusion of 'the loss of the best and most versatile agricultural land' to be at odds with the other elements listed, where unlike the others mentioned, the loss of agricultural land would have limited, if any, impact on people, residential amenity and property.

3.29 It is acknowledged that the loss of BMV agricultural land may impact the VoG's overall amount of high quality agricultural land, however this should be assessed against the existing high level of BMV agricultural land within the County. The extent to which its loss is considered "unacceptable" should be subject to the planning balance against the overriding need for affordable housing and local housing need. Consideration towards the farming business case and economic viability are also required within the planning balance. In the case of Land West of Swanbridge Road, the loss of BMV agricultural land remains the only constraint that cannot be overcome, as noted in the Candidate Site Assessment. Whilst the loss of high quality agricultural land should be avoided, Taylor Wimpey consider that where the merits of the Site are overwhelmingly in favour for sustainable residential development in a suitable and logical location, Policy DNP5 should not stand in the way of housing delivery.

3.30 Whilst Taylor Wimpey support the clause within the draft policy: "Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the impact identified to an acceptable level. Planning conditions may be imposed, or legal obligation entered into, to secure any necessary

mitigation and monitoring processes." However, in the context of BMV agricultural land, it is not clear how the mitigating measures, in the form of planning conditions or legal obligations, can be applied. This reinforces the earlier view that the inclusion of 'the loss of the best and most versatile agricultural land', as currently worded within the draft policy, is at odds with the other elements listed where mitigation strategies for pollution can be suitably conditioned.

Change suggested by respondent:

The 2022-based Welsh Government Projections should be used to determine the housing requirement, not the 2018-based projections.

The 10% flexibility allowance is insufficient and should be increased to 20%.

A 20% non-delivery allowance on land bank sites should be included.

Housing numbers from Windfall Sites should be reduced by 25%, following Cardiff Council's approach.

The deliverability of the rolled forward sites is clearly uncertain and should be removed from the Plan.

Taylor Wimpey have provided a suggested Housing Supply table.

Sound: No

Attachments:

Redacted Deposit Representation Form - https://valeofglamorgan.oc2.uk/a/3c8
Redacted Candidate Site Rep Form - https://valeofglamorgan.oc2.uk/a/3c9
Redacted Candidate Site Rep Form 2 - https://valeofglamorgan.oc2.uk/a/3cv
Redacted ISA HRA Representation Form - https://valeofglamorgan.oc2.uk/a/3cb
Redacted Supporting Evidence - https://valeofglamorgan.oc2.uk/a/3g5

6860 Object

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Mr Andrew Raymond [1170]
Agent: Boyer Planning

Summary:

Concerns are raised regarding the overall housing requirement and the level of flexibility incorporated within the Plan. Policy SP6 currently establishes a housing requirement of 7,890 dwellings over the Plan period and includes a flexibility allowance of 10%, resulting in an overall provision of 8,660 dwellings. Whilst the inclusion of a flexibility allowance is supported, it is considered that a 10% allowance may not be sufficient to ensure resilience within the housing trajectory. Recent experience from other Local Development Plans across Wales has demonstrated the importance of incorporating higher flexibility allowances to account for delivery uncertainty, infrastructure constraints and potential delays to larger strategic sites.
For example, other authorities have incorporated flexibility allowances in excess of the standard 10% to ensure the robustness of their housing supply and to provide a greater degree of adaptability should circumstances change during the Plan period.

Full text:

Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409)
Boyer have prepared the following representation on behalf of Andrew Raymond regarding their land interests associated with Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) in response to the current Vale of Glamorgan Replacement Local Development Plan (RLDP) 2021– 2036 consultation.

A summary of the main representations are as follows:
• Concern regarding the absence of proportionate residential growth opportunities within rural settlements such as Colwinston;
• Concern regarding the overall housing requirement and the need for an increased flexibility allowance within the housing trajectory;
• Questions regarding the spatial distribution of development and the limited range and choice of sites outside the Strategic Growth Area;
• Confirmation that Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) represents a logical and sustainable opportunity for modest residential development;
• Review of the Candidate Site Assessment process and the current status of the site within the Candidate Site Register; and
• The need to consider appropriate settlement boundary adjustments to facilitate proportionate growth in sustainable rural settlements.

SP1: Sustainable Growth Strategy
Whilst Policy SP1 outlines the housing delivery requirement (addressed under the response to SP6), the principal concern in relation to the site promotion is the concentration of the majority of future housing growth within the defined Strategic Growth Area.

It is understood and supported that new housing development should be located in sustainable locations with access to public transport and services. However, the approach adopted within the RLDP places an overly narrow emphasis on growth within the Strategic Growth Area, primarily focused along rail corridors. This approach risks overlooking other sustainable rural settlements which also demonstrate appropriate connectivity and capacity to accommodate proportionate growth.

Settlements outside the Strategic Growth Area continue to perform an important role within the Vale's settlement hierarchy and rural economy. Villages such as Colwinston provide an established residential community and contribute to the vitality and sustainability of rural areas. Restricting opportunities for modest growth within such settlements risks undermining the long-term sustainability of rural communities.

The principle of directing development to sustainable settlements is supported. However, limiting development opportunities exclusively within the Strategic Growth Area is not considered to represent the most balanced or flexible spatial strategy. Greater flexibility should be introduced to allow appropriate small-scale allocations within sustainable rural settlements.

In this context, Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) represents a sustainable opportunity for a modest residential development that would align with the scale and character of the settlement. The site lies adjacent to existing built form and would represent a logical and contained extension to the village.
SP2: Settlement Hierarchy

Mr Raymond supports the identification of Colwinston as a Minor Rural Settlement and acknowledged its capacity to accommodate proportionate and sustainable growth, particularly given its accessibility and relationship with Bridgend to the west and Cowbridge, Barry and Cardiff to the east. The Deposit Plan retains Colwinston within the Minor Rural Settlement tier, however, does confirm that the settlement is outside the Strategic Growth Area.
Whilst the overarching principle of directing growth to the most sustainable settlements is supported, the Plan does not clearly demonstrate why settlements that are well connected and functionally related to larger centres, such as Colwinston, should be subject to such constrained growth.

In this context, Mr Raymond highlights Paragraph 3.10 which indicates that Minor Rural Settlements provide an 'important range of services and facilities that play a functional role in meeting some of the basic needs of residents within rural areas, reducing the need to travel'.
Building upon this, Policy SP2 does highlight that 'Minor Rural Settlements identified will be limited to the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments'.

Furthermore, the supporting text to Policy SP2 (Paragraph 6.17) confirms that 'those settlements that are considered to have sufficient population, services, and facilities to accommodate small scale growth without it having a detrimental impact on their existing character and local environment'.

This all building upon the identified importance of Minor Rual Settlements within the Preferred Strategy which outlined in Paragraph 6.50 that it is 'essential for the LDP to balance the growth in a way that supports the need of rural communities' and whilst it is evident that within these settlements 'general market housing will be limited to opportunities including infill' (Paragraph 6.51), the enabling of an element of 'open market housing will provide opportunities for the delivery of affordable housing reflecting the aspirations of rural communities to sustain their housing needs' (Paragraph 6.51). This importance of Minor Rural Settlements needs to be carried more strongly forward in the Deposit Plan.

Moreover, the evidence base does not sufficiently justify the degree of restriction now applied, nor does it explain why proportionate additional growth in appropriate Minor Rural Settlements would undermine the spatial strategy. As drafted, the policy risks limiting flexibility in the distribution of housing across the Vale. Accordingly, it is considered that the approach to Colwinston under Policy SP2 is not justified.

Clearly there continues to be a disconnect between the identified role and function of Colwinston, which is supported, and the actual ability to deliver the appropriate range and choice of dwellings in the rural settlements. For example, a modest allocation at Land adjacent to Waterton Lodge, Colwinston (Candidate Site 409) would represent proportionate growth that reflects the scale and character of the settlement. The site sits adjacent to existing development and would consolidate the existing settlement pattern without resulting in sprawl into the open countryside.

The current approach within Policy SP2 risks constraining flexibility within the spatial strategy and limiting opportunities to support sustainable rural communities.

SP6: Housing Requirement
Concerns are raised regarding the overall housing requirement and the level of flexibility incorporated within the Plan.

Policy SP6 currently establishes a housing requirement of 7,890 dwellings over the Plan period and includes a flexibility allowance of 10%, resulting in an overall provision of 8,660 dwellings.
The proposed supply is anticipated to be delivered through:

• 3,837 dwellings from the existing land supply
• 3,520 dwellings on allocated sites
• 1,303 dwellings from large and small windfall developments
Whilst the inclusion of a flexibility allowance is supported, it is considered that a 10% allowance may not be sufficient to ensure resilience within the housing trajectory.
Recent experience from other Local Development Plans across Wales has demonstrated the importance of incorporating higher flexibility allowances to account for delivery uncertainty, infrastructure constraints and potential delays to larger strategic sites.

For example, other authorities have incorporated flexibility allowances in excess of the standard 10% to ensure the robustness of their housing supply and to provide a greater degree of adaptability should circumstances change during the Plan period.

In this context, it is considered that the Vale of Glamorgan RLDP should incorporate a flexibility allowance of at least 15%. This would provide additional resilience within the housing trajectory and reduce reliance on a limited number of larger strategic allocations.
Smaller sites such as Candidate Site 409 at Waterton Lodge, Colwinston are particularly valuable in this context. Smaller sites are typically:
• More deliverable in the short term
• Less dependent on major infrastructure investment
• Capable of contributing to early housing delivery
• Able to increase overall build-out rates
Such sites can therefore play an important role in supporting the delivery of the Plan's housing requirement and enhancing flexibility within the supply.

HG1: Housing Allocations
Mr Raymond does not comment on any of the proposed housing allocations, however, does highlight that the delivery is incumbent upon a number of larger strategic sites, and that to allow a greater range and choice then smaller allocations in the Minor Rural Settlements are required. Only 122 units are proposed on smaller allocated sites, equating to approximately 2.6% of newly allocated supply under (E) Rural Affordable Housing Led Sites – policy HG4.

In the context of the above, there remains significant concern that the spatial strategy continues to exclude the required number of allocations within Minor Rural Settlements, including Colwinston.

The Plan recognises that Minor Rural Settlements provide an important range of services and facilities and play a functional role in meeting the needs of residents within rural areas. It further acknowledges that it is essential for the LDP to balance growth in a way that supports rural communities. Whilst general market housing is described as being limited to infill opportunities, the Plan also recognises that enabling an element of open market housing provides opportunities for the delivery of affordable housing and helps sustain rural communities.
It is agreed that the inclusion of smaller allocations can:
• Improve overall housing delivery rates
• Provide greater choice within the housing market
• Reduce delivery risk by diversifying supply
• Support rural communities through proportionate growth

Whilst it is noted that there is a proposed allocation within Colwinston – HG4 (1) – Land to the East of Colwinston for 25 units, Mr Raymond maintains that there is still a clear disconnect between the identified role and function of settlements such as Colwinston and the absence of any further allocated sites capable of delivering an appropriate range and choice of dwellings.

The strategy effectively restricts development to windfall and infill, without positively identifying opportunities that would logically consolidate and strengthen the settlement.
This approach is inconsistent with the settlement's accessibility and functional role. Colwinston is:
• Well connected to the A48 strategic highway network;
• Served by bus routes within close proximity to the site;
• Within commuting distance of Bridgend, Cowbridge, Barry and Cardiff;
• A sustainable and established residential community.
Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409) represents a contained and sustainable opportunity that naturally rounds off the existing settlement boundary. The site encloses the envelope of development without encroaching into open countryside or extending beyond the established line of built form. It is well related to existing services and infrastructure and is capable of accommodating a modest allocation consistent with the scale and character of the village.

A proportionate allocation at this location would align with the stated objectives of supporting rural communities, enabling a mix of market and affordable housing, and providing genuine choice within Minor Rural Settlements. The continued absence of such allocations undermines the internal consistency of the spatial strategy.

Furthermore, the strategy places substantial emphasis on rail-based corridors. Whilst development near rail

infrastructure is supported in principle, sustainable growth should not be exclusively rail-led. Strategic highway connectivity and bus accessibility also represent legitimate and sustainable locational advantages.

The complete absence of allocations in Minor Rural Settlements creates an imbalance in distribution and limits housing choice. A modest allocation at Waterton Lodge would represent proportionate growth consistent with the scale and character of the settlement.

HG4 – Affordable Housing Allocations
It is recognised that Policy HG4 does allocate development within some Minor Rural Settlements, and in particular within Colwinston HG4 (1) – Land to the East of Colwinston for 25 units. In the context of Policy HG4 they will be affordable housing led sites where there will be a requirement for the provision of a minimum 50% affordable housing. This is to meet the affordable housing needs of the local community. Mr Raymond has no objection in principle to this but does object to the fact that there is no other development opportunities recognised in Colwinston (despite it being sustainably located on the A48).

Furthermore, Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409) could be reduced in size and could be amended to offer 50% affordable housing to accord with the policy (or even 100% affordable if the Authority sought this).

A balanced approach which allows both affordable housing led schemes and modest mixed-tenure developments would provide greater flexibility and assist in delivering a broader range of housing needs.

A modest development at Land adjacent to Waterton Lodge, Colwinston (Candidate Site 409) could provide an opportunity to deliver both market and affordable housing in accordance with Policy SP8. This would support local housing needs whilst maintaining the scale and character of the settlement.

Candidate Site Response: Land adjacent to Waterton Lodge, Colwinston (Candidate Site 409)
Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) was submitted to the Vale of Glamorgan Council during the 2022 Call for Candidate Sites as part of the preparation of the Replacement Local Development Plan (RLDP) 2021–2036.

The site is currently included within the Candidate Site Register, which represents a list of sites submitted for consideration through the plan-making process. Inclusion within the register does not in itself indicate that a site will be allocated for development, as all sites are subject to a structured assessment process.

These stages consider a range of factors including sustainability, accessibility, environmental constraints and deliverability.

As part of the ongoing plan preparation process, the Council produced an updated Candidate Site Register following the initial submissions. Sites continue to be evaluated as part of the evidence base supporting the RLDP.

In this context, Land adjacent to Waterton Lodge, Colwinston represents a sustainable and deliverable opportunity for modest residential development which could contribute positively towards the Plan's housing supply.

The site is located adjacent to the existing settlement and is well related to the current built form. Development in this location would represent a logical and contained extension to the village, rather than an isolated incursion into open countryside.

Furthermore, the site has been promoted through the formal candidate site process and should therefore be considered fully within the Council's site assessment framework.

Deposit Plan Considerations
Settlement Boundary

Given the location of Candidate Site 409 adjacent to the existing settlement of Colwinston, consideration should be given to whether a modest adjustment to the settlement boundary would enable the site to be appropriately integrated within the settlement.

A logical rounding-off of the existing settlement edge would allow development to occur in a manner that respects the existing built form and maintains a clear and defensible settlement boundary.

Such an approach would represent a proportionate response to the need for modest housing growth within rural settlements.

Site Assessment
The site was formally submitted through the Candidate Site process and is currently listed within the Council's Candidate Site Register.

Given the role that smaller deliverable sites can play in supporting housing delivery, it is important that sites such as

Land adjacent to Waterton Lodge, Colwinston are fully considered as part of the ongoing assessment process. Smaller sites can provide valuable flexibility within the housing trajectory and contribute to early housing delivery within the Plan period.

Turning to the main reasons the site was not taken forward Mr Raymond provides the following response:
(a) Alleged intrusion into the open countryside
The Stage 2 Register cites "unacceptable intrusion into the open countryside". Mr Raymond submits that this conclusion fails to reflect the site's physical containment and relationship to the built form.
• The site directly adjoins existing dwellings at Waterton Lodge and mature boundary hedgerows; development here would constitute rounding-off rather than isolated sprawl.
• A strong landscape framework already exists, and additional planting could reinforce defensible boundaries.
Accordingly, the site's development would not materially extend the settlement into open countryside or harm landscape character, consistent with PPW paragraph 3.60.
(b) Highways and accessibility constraints
The Council refers to "major highways constraints" but no evidence highway assessment has been published by the Authority. Mr Raymond's preliminary review confirms that safe vehicular access can be achieved from the adjoining local highway with modest engineering works and that the scale envisaged would generate limited traffic, well within local-road capacity.
Future submission of a Transport Statement can demonstrate compliance with PPW (Section 5: Active and Socially Just Places) and LDP Policy MD2 (criteria 6 and 8).
The site lies within walking distance of Colwinston's core facilities (village hall, public house, bus stops), enabling sustainable travel choices for residents.
(c) Scale of development
Development at a scale that represents proportionate growth for Colwinston can be provided and would be entirely consistent with the "limited expansion" envisaged for minor rural settlements under PPW and the RLDP.
This level of growth would strengthen local demographics, support the rural housing supply and modestly contribute to the Vale's overall housing requirement, without exceeding infrastructure capacity.
(d) Ecology, landscape and agricultural land classification
The land is semi-improved grassland with no statutory designations. Preliminary review indicates no SINC coverage or protected species constraints. Detailed ecological and agricultural-land surveys can be provided to confirm that any residual impacts are minor and capable of full mitigation.

Development can achieve net biodiversity gain through buffer planting, sustainable drainage and native-hedgerow reinforcement, fully consistent with PPW and RLDP environmental objectives.

5. Sustainability and deliverability
• Availability: Mr Raymond, as landowner/promoter, confirms the site is immediately available for development.
• Deliverability: The site is modest, unconstrained by flood risk or abnormal infrastructure requirements, and can deliver homes within the early part of the plan period.
The proposal supports rural-settlement vitality, contributes to local housing choice, and allows design to embody placemaking principles (PPW Ed. 12 Section 2).

Conclusion
This representation, submitted on behalf of Mr Raymond in response to the current Vale of Glamorgan Council Replacement Local Development Plan (RLDP) 2021–2036 Deposit Plan Consultation, maintains that Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409) represents a logical, sustainable and deliverable parcel that should be allocated as a suitable and viable residential site within the RLDP.

Accordingly, the site is considered to represent a suitable, available and achievable allocation capable of contributing to the housing requirement, supporting affordable housing delivery, and reinforcing the spatial objectives of the Plan.

Change suggested by respondent:

It is considered that the Vale of Glamorgan RLDP should incorporate a flexibility allowance of at least 15%. This would provide additional resilience within the housing trajectory and reduce reliance on a limited number of larger strategic allocations.

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3vf

6862 Object

Document Element: SP6 - HOUSING REQUIREMENT, Table 3: Spatial

Respondent: Mr Andrew Raymond [1170]

Agent: Boyer Planning

Summary:

Delivery is incumbent upon a number of larger strategic sites, and that to allow a greater range and choice then smaller allocations in the Minor Rural Settlements are required. Only 122 units are proposed on smaller allocated sites, equating to approximately 2.6% of newly allocated supply under (E) Rural Affordable Housing Led Sites – policy HG4. In the context of the above, there remains significant concern that the spatial strategy continues to exclude the required number of allocations within Minor Rural Settlements, including Colwinston.

It is agreed that the inclusion of smaller allocations can:
• Improve overall housing delivery rates
• Provide greater choice within the housing market
• Reduce delivery risk by diversifying supply
• Support rural communities through proportionate growth

Whilst it is noted that there is a proposed allocation within Colwinston – HG4 (1) – Land to the East of Colwinston for 25 units, there is still a clear disconnect between the identified role and function of settlements such as Colwinston and the absence of any further allocated sites capable of delivering an appropriate range and choice of dwellings. The strategy effectively restricts development to windfall and infill, without positively identifying opportunities that would logically consolidate and strengthen the settlement. This approach is inconsistent with the settlement's accessibility and functional role.

Full text:

Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409)
Boyer have prepared the following representation on behalf of Andrew Raymond regarding their land interests associated with Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) in response to the current Vale of Glamorgan Replacement Local Development Plan (RLDP) 2021– 2036 consultation.

A summary of the main representations are as follows:
• Concern regarding the absence of proportionate residential growth opportunities within rural settlements such as Colwinston;
• Concern regarding the overall housing requirement and the need for an increased flexibility allowance within the housing trajectory;
• Questions regarding the spatial distribution of development and the limited range and choice of sites outside the Strategic Growth Area;
• Confirmation that Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) represents a logical and sustainable opportunity for modest residential development;
• Review of the Candidate Site Assessment process and the current status of the site within the Candidate Site Register; and
• The need to consider appropriate settlement boundary adjustments to facilitate proportionate growth in sustainable rural settlements.

SP1: Sustainable Growth Strategy
Whilst Policy SP1 outlines the housing delivery requirement (addressed under the response to SP6), the principal concern in relation to the site promotion is the concentration of the majority of future housing growth within the defined Strategic Growth Area.
It is understood and supported that new housing development should be located in sustainable locations with access to public transport and services. However, the approach adopted within the RLDP places an overly narrow emphasis on growth within the Strategic Growth Area, primarily focused along rail corridors. This approach risks overlooking other sustainable rural settlements which also demonstrate appropriate connectivity and capacity to accommodate proportionate growth.

Settlements outside the Strategic Growth Area continue to perform an important role within the Vale's settlement hierarchy and rural economy. Villages such as Colwinston provide an established residential community and contribute to the vitality and sustainability of rural areas. Restricting opportunities for modest growth within such settlements risks undermining the long-term sustainability of rural communities.

The principle of directing development to sustainable settlements is supported. However, limiting development opportunities exclusively within the Strategic Growth Area is not considered to represent the most balanced or flexible spatial strategy. Greater flexibility should be introduced to allow appropriate small-scale allocations within sustainable rural settlements.

In this context, Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) represents a sustainable opportunity for a modest residential development that would align with the scale and character of the settlement. The site lies adjacent to existing built form and would represent a logical and contained extension to the village.
SP2: Settlement Hierarchy

Mr Raymond supports the identification of Colwinston as a Minor Rural Settlement and acknowledged its capacity to accommodate proportionate and sustainable growth, particularly given its accessibility and relationship with Bridgend to the west and Cowbridge, Barry and Cardiff to the east. The Deposit Plan retains Colwinston within the Minor Rural Settlement tier, however, does confirm that the settlement is outside the Strategic Growth Area.

Whilst the overarching principle of directing growth to the most sustainable settlements is supported, the Plan does not clearly demonstrate why settlements that are well connected and functionally related to larger centres, such as Colwinston, should be subject to such constrained growth.

In this context, Mr Raymond highlights Paragraph 3.10 which indicates that Minor Rural Settlements provide an 'important range of services and facilities that play a functional role in meeting some of the basic needs of residents within rural areas, reducing the need to travel'.
Building upon this, Policy SP2 does highlight that 'Minor Rural Settlements identified will be limited to the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments'.

Furthermore, the supporting text to Policy SP2 (Paragraph 6.17) confirms that 'those settlements that are considered to have sufficient population, services, and facilities to accommodate small scale growth without it having a detrimental impact on their existing character and local environment'.

This all building upon the identified importance of Minor Rual Settlements within the Preferred Strategy which outlined in Paragraph 6.50 that it is 'essential for the LDP to balance the growth in a way that supports the need of rural communities' and whilst it is evident that within these settlements 'general market housing will be limited to opportunities including infill' (Paragraph 6.51), the enabling of an element of 'open market housing will provide opportunities for the delivery of affordable housing reflecting the aspirations of rural communities to sustain their housing needs' (Paragraph 6.51). This importance of Minor Rural Settlements needs to be carried more strongly forward in the Deposit Plan.

Moreover, the evidence base does not sufficiently justify the degree of restriction now applied, nor does it explain why proportionate additional growth in appropriate Minor Rural Settlements would undermine the spatial strategy. As drafted, the policy risks limiting flexibility in the distribution of housing across the Vale. Accordingly, it is considered that the approach to Colwinston under Policy SP2 is not justified.

Clearly there continues to be a disconnect between the identified role and function of Colwinston, which is supported, and the actual ability to deliver the appropriate range and choice of dwellings in the rural settlements. For example, a modest allocation at Land adjacent to Waterton Lodge, Colwinston (Candidate Site 409) would represent proportionate growth that reflects the scale and character of the settlement. The site sits adjacent to existing development and would consolidate the existing settlement pattern without resulting in sprawl into the open countryside.

The current approach within Policy SP2 risks constraining flexibility within the spatial strategy and limiting opportunities to support sustainable rural communities.

SP6: Housing Requirement
Concerns are raised regarding the overall housing requirement and the level of flexibility incorporated within the Plan.

Policy SP6 currently establishes a housing requirement of 7,890 dwellings over the Plan period and includes a flexibility allowance of 10%, resulting in an overall provision of 8,660 dwellings.
The proposed supply is anticipated to be delivered through:
• 3,837 dwellings from the existing land supply
• 3,520 dwellings on allocated sites
• 1,303 dwellings from large and small windfall developments
Whilst the inclusion of a flexibility allowance is supported, it is considered that a 10% allowance may not be sufficient to ensure resilience within the housing trajectory.
Recent experience from other Local Development Plans across Wales has demonstrated the importance of incorporating higher flexibility allowances to account for delivery uncertainty, infrastructure constraints and potential delays to larger strategic sites.

For example, other authorities have incorporated flexibility allowances in excess of the standard 10% to ensure the robustness of their housing supply and to provide a greater degree of adaptability should circumstances change during the Plan period.

In this context, it is considered that the Vale of Glamorgan RLDP should incorporate a flexibility allowance of at least 15%. This would provide additional resilience within the housing trajectory and reduce reliance on a limited number of larger strategic allocations.
Smaller sites such as Candidate Site 409 at Waterton Lodge, Colwinston are particularly valuable in this context. Smaller sites are typically:
• More deliverable in the short term
• Less dependent on major infrastructure investment
• Capable of contributing to early housing delivery
• Able to increase overall build-out rates
Such sites can therefore play an important role in supporting the delivery of the Plan's housing requirement and enhancing flexibility within the supply.

HG1: Housing Allocations
Mr Raymond does not comment on any of the proposed housing allocations, however, does highlight that the delivery is incumbent upon a number of larger strategic sites, and that to allow a greater range and choice then smaller allocations in the Minor Rural Settlements are required. Only 122 units are proposed on smaller allocated sites, equating to approximately 2.6% of newly allocated supply under (E) Rural Affordable Housing Led Sites – policy HG4.

In the context of the above, there remains significant concern that the spatial strategy continues to exclude the required number of allocations within Minor Rural Settlements, including Colwinston.

The Plan recognises that Minor Rural Settlements provide an important range of services and facilities and play a functional role in meeting the needs of residents within rural areas. It further acknowledges that it is essential for the LDP to balance growth in a way that supports rural communities. Whilst general market housing is described as being limited to infill opportunities, the Plan also recognises that enabling an element of open market housing provides opportunities for the delivery of affordable housing and helps sustain rural communities.
It is agreed that the inclusion of smaller allocations can:
• Improve overall housing delivery rates
• Provide greater choice within the housing market
• Reduce delivery risk by diversifying supply
• Support rural communities through proportionate growth

Whilst it is noted that there is a proposed allocation within Colwinston – HG4 (1) – Land to the East of Colwinston for 25 units, Mr Raymond maintains that there is still a clear disconnect between the identified role and function of settlements such as Colwinston and the absence of any further allocated sites capable of delivering an appropriate range and choice of dwellings.

The strategy effectively restricts development to windfall and infill, without positively identifying opportunities that would logically consolidate and strengthen the settlement.
This approach is inconsistent with the settlement's accessibility and functional role. Colwinston is:
• Well connected to the A48 strategic highway network;
• Served by bus routes within close proximity to the site;
• Within commuting distance of Bridgend, Cowbridge, Barry and Cardiff;
• A sustainable and established residential community.
Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409) represents a contained and sustainable opportunity that naturally rounds off the existing settlement boundary. The site encloses the envelope of development without encroaching into open countryside or extending beyond the established line of built form. It is well related to existing services and infrastructure and is capable of accommodating a modest allocation consistent with the scale and character of the village.

A proportionate allocation at this location would align with the stated objectives of supporting rural communities, enabling a mix of market and affordable housing, and providing genuine choice within Minor Rural Settlements. The continued absence of such allocations undermines the internal consistency of the spatial strategy.

Furthermore, the strategy places substantial emphasis on rail-based corridors. Whilst development near rail infrastructure is supported in principle, sustainable growth should not be exclusively rail-led. Strategic highway connectivity and bus accessibility also represent legitimate and sustainable locational advantages.

The complete absence of allocations in Minor Rural Settlements creates an imbalance in distribution and limits housing choice. A modest allocation at Waterton Lodge would represent proportionate growth consistent with the scale and character of the settlement.

HG4 – Affordable Housing Allocations
It is recognised that Policy HG4 does allocate development within some Minor Rural Settlements, and in particular within Colwinston HG4 (1) – Land to the East of Colwinston for 25 units. In the context of Policy HG4 they will be affordable housing led sites where there will be a requirement for the provision of a minimum 50% affordable housing. This is to meet the affordable housing needs of the local community. Mr Raymond has no objection in principle to this but does object to the fact that there is no other development opportunities recognised in Colwinston (despite it being sustainably located on the A48).

Furthermore, Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409) could be reduced in size and could be amended to offer 50% affordable housing to accord with the policy (or even 100% affordable if the Authority sought this).

A balanced approach which allows both affordable housing led schemes and modest mixed-tenure developments would provide greater flexibility and assist in delivering a broader range of housing needs.

A modest development at Land adjacent to Waterton Lodge, Colwinston (Candidate Site 409) could provide an opportunity to deliver both market and affordable housing in accordance with Policy SP8. This would support local housing needs whilst maintaining the scale and character of the settlement.

Candidate Site Response: Land adjacent to Waterton Lodge, Colwinston (Candidate Site 409)
Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) was submitted to the Vale of Glamorgan Council during the 2022 Call for Candidate Sites as part of the preparation of the Replacement Local Development Plan (RLDP) 2021–2036.

The site is currently included within the Candidate Site Register, which represents a list of sites submitted for consideration through the plan-making process. Inclusion within the register does not in itself indicate that a site will be allocated for development, as all sites are subject to a structured assessment process.

These stages consider a range of factors including sustainability, accessibility, environmental constraints and deliverability.

As part of the ongoing plan preparation process, the Council produced an updated Candidate Site Register following the initial submissions. Sites continue to be evaluated as part of the evidence base supporting the RLDP.

In this context, Land adjacent to Waterton Lodge, Colwinston represents a sustainable and deliverable opportunity for modest residential development which could contribute positively towards the Plan's housing supply.

The site is located adjacent to the existing settlement and is well related to the current built form. Development in this location would represent a logical and contained extension to the village, rather than an isolated incursion into open countryside.

Furthermore, the site has been promoted through the formal candidate site process and should therefore be considered fully within the Council's site assessment framework.

Deposit Plan Considerations
Settlement Boundary

Given the location of Candidate Site 409 adjacent to the existing settlement of Colwinston, consideration should be given to whether a modest adjustment to the settlement boundary would enable the site to be appropriately integrated within the settlement.

A logical rounding-off of the existing settlement edge would allow development to occur in a manner that respects the existing built form and maintains a clear and defensible settlement boundary.

Such an approach would represent a proportionate response to the need for modest housing growth within rural settlements.

Site Assessment
The site was formally submitted through the Candidate Site process and is currently listed within the Council's Candidate Site Register.

Given the role that smaller deliverable sites can play in supporting housing delivery, it is important that sites such as Land adjacent to Waterton Lodge, Colwinston are fully considered as part of the ongoing assessment process.
Smaller sites can provide valuable flexibility within the housing trajectory and contribute to early housing delivery within the Plan period.

Turning to the main reasons the site was not taken forward Mr Raymond provides the following response:
(a) Alleged intrusion into the open countryside
The Stage 2 Register cites "unacceptable intrusion into the open countryside". Mr Raymond submits that this conclusion fails to reflect the site's physical containment and relationship to the built form.
• The site directly adjoins existing dwellings at Waterton Lodge and mature boundary hedgerows; development here would constitute rounding-off rather than isolated sprawl.
• A strong landscape framework already exists, and additional planting could reinforce defensible boundaries.
Accordingly, the site's development would not materially extend the settlement into open countryside or harm landscape character, consistent with PPW paragraph 3.60.
(b) Highways and accessibility constraints
The Council refers to "major highways constraints" but no evidence highway assessment has been published by the Authority. Mr Raymond's preliminary review confirms that safe vehicular access can be achieved from the adjoining local highway with modest engineering works and that the scale envisaged would generate limited traffic, well within local-road capacity.
Future submission of a Transport Statement can demonstrate compliance with PPW (Section 5: Active and Socially Just Places) and LDP Policy MD2 (criteria 6 and 8).
The site lies within walking distance of Colwinston's core facilities (village hall, public house, bus stops), enabling sustainable travel choices for residents.
(c) Scale of development
Development at a scale that represents proportionate growth for Colwinston can be provided and would be entirely consistent with the "limited expansion" envisaged for minor rural settlements under PPW and the RLDP.

This level of growth would strengthen local demographics, support the rural housing supply and modestly contribute to the Vale's overall housing requirement, without exceeding infrastructure capacity.
(d) Ecology, landscape and agricultural land classification
The land is semi-improved grassland with no statutory designations. Preliminary review indicates no SINC coverage or protected species constraints. Detailed ecological and agricultural-land surveys can be provided to confirm that any residual impacts are minor and capable of full mitigation.

Development can achieve net biodiversity gain through buffer planting, sustainable drainage and native-hedgerow reinforcement, fully consistent with PPW and RLDP environmental objectives.

5. Sustainability and deliverability
• Availability: Mr Raymond, as landowner/promoter, confirms the site is immediately available for development.
• Deliverability: The site is modest, unconstrained by flood risk or abnormal infrastructure requirements, and can deliver homes within the early part of the plan period.
The proposal supports rural-settlement vitality, contributes to local housing choice, and allows design to embody placemaking principles (PPW Ed. 12 Section 2).

Conclusion
This representation, submitted on behalf of Mr Raymond in response to the current Vale of Glamorgan Council Replacement Local Development Plan (RLDP) 2021–2036 Deposit Plan Consultation, maintains that Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409) represents a logical, sustainable and deliverable parcel that should be allocated as a suitable and viable residential site within the RLDP.

Accordingly, the site is considered to represent a suitable, available and achievable allocation capable of contributing to the housing requirement, supporting affordable housing delivery, and reinforcing the spatial objectives of the Plan.

Change suggested by respondent:

The complete absence of allocations in Minor Rural Settlements creates an imbalance in distribution and limits housing choice. A further allocation in Colwinston would represent proportionate growth consistent with the scale and character of the settlement.

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3vf

6896 Object

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Catesby Estates [3713]
Agent: Turley

Summary:

Catesby argues that the proposed housing figures remain insufficient. They contend that the growth level is too low when measured against the aspirations of Future Wales and the most recent population and household projections. Catesby suggests that a more robust and ambitious growth strategy is necessary to meet the actual housing needs of the Vale, advocating for an upward revision of the total requirement.

Noting Llandow's accessible location and proximity to existing and emerging strategic employment opportunities, Catesby broadly SUPPORTS the Sustainable Growth Strategy insofar as seeking to achieve the housing requirement through a range of housing opportunities. This includes the co-locating of housing and employment growth, with a focus on established business parks and industrial estates.

Full text:

VALE OF GLAMORGAN DEPOSIT REPLACEMENT LOCAL DEVELOPMENT PLAN - REPRESENTATION ON BEHALF OF CATESBY ESTATES

This response to the consultation on the Vale of Glamorgan Council ('VoGC') Deposit Replacement Local Development Plan ('RLDP') is submitted by Turley on behalf of Catesby Estates ('Catesby'). It sets out Catesby's comments on the Vale of Glamorgan Deposit Replacement LDP published for consultation on 28th January 2026.

Catesby control a significant amount of land at, and surrounding Llandow Airfield, and sought promotion (previously promoted by L&Q Estates prior to its acquisition by Catesby) of the site during the call for Candidate Sites (Site ID Ref: 448). The Stage 2 Candidate Site Register confirms that the site was not considered suitable for further consideration by VoGC. This was primarily due to its location outside of existing settlement boundaries and the scale of dwellings/services proposed. It was concluded that the scale of development proposed could be considered a new settlement, which should only be proposed as part of a joint LDP, an SDP or Future Wales.

Catesby acknowledges that promotion of a site of this scale falls outside the scope of the RDLP. The site will be promoted through the emerging South East Wales Strategic Development Plan in due course. Catesby maintains that the

site is capable of accommodating major development and that its promotion for strategic scale regeneration is entirely appropriate given its sustainable credentials and the contribution that it can make to the Vale of Glamorgan and wider Cardiff Capital Region. Catesby remains keen to working collaboratively with VoGC to bring forward development at Llandow in the medium to long term and looks forward to continuing the largely positive discussions that have taken place to date.

VISION AND STRATEGIC OBJECTIVES

The vision for the Deposit RLDP maintains that, by 2036, VoGC will provide housing growth which responds to the authority's growing population and caters for all. This should be shaped through successful placemaking, delivering diverse communities and ensuring that the Vale is a healthy and inclusive place for everyone.

VoGC identifies key themes and strategic objectives to deliver the vision of the Deposit RLDP. This includes "ensuring that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population", to address the accommodation needs of all the Vale's communities (Objective 3 - Homes for All). Objective 4 – Placemaking also seeks for new development to be appropriately located, contribute towards creating active, safe and accessible places, and protect and enhance the character of existing communities.

The provision of a mix of new homes is also crucial in fostering diverse, vibrant and connected communities in line with Objective 7. Consequently, physical, economic and social regeneration are facilitated, reflecting the needs and aspirations of local communities. Vital and vibrant rural communities are also provided through the delivery of growth in sustainable locations and supporting infrastructure.

Catesby broadly SUPPORTS the vision and strategic objectives of the Deposit RLDP to deliver a mix of high-quality new housing which responds to the authority's growing population, caters for all, and has placemaking at its heart. This new housing should be facilitated across the Vale in a variety of sustainable locations to best serve as many communities as possible.

SUSTAINABLE GROWTH STRATEGY

A key part of the Sustainable Growth Strategy for the Deposit RLDP is to deliver a sustainable level of housing growth which accords with the Vale's position within the Cardiff Capital Region (CCR). Specifically, the Deposit RLDP makes provision for a housing requirement of 7,980 dwellings over the Plan period (526 dwellings per annum). The Deposit RLDP makes clear that this is both deliverable and ambitious, reflecting the Vale's position in the Future Wales national growth area. Crucially, the housing requirement will be achieved through a range of housing opportunities, to encourage existing residents to live and work in the Vale and encourage inward migration of new residents, at a level commensurate with the CCR.

However, Catesby would suggest that this level of growth is still too low, taking into account the aspirations of Future Wales for the area and the latest population and household projections, which suggest a higher level of need is required for the Vale.
The Sustainable Growth Strategy also seeks for new and existing housing, employment, services and facilities to be co-located to reduce the need to travel. New housing development shall be specifically located in places that are already well served by existing and/or proposed services, facilities and employment opportunities. This includes, where appropriate, those offered by the business parks and industrial estates already established in the Vale. The Strategy also allows for regeneration opportunities on previously developed and under-utilised land.

The Key Diagram (Figure 1) identifies the proposed Strategic Growth Area (SGA), connectivity routes, key locations for future development, the Plan's hierarchy of settlements and interrelationships with adjoining local authorities.

Figure 1: Key Diagram

Catesby considers that the Minor Rural Settlements dispersed within the 'Connectivity' corridor, such as Llandow, should play a supporting role in accommodating housing growth, given their important range of services and facilities that reduce the need to travel. The Sustainable Growth Strategy also allows for small scale affordable housing led developments in Minor Rural Settlements, where appropriate.

Noting Llandow's accessible location and proximity to existing and emerging strategic employment opportunities, Catesby broadly SUPPORTS the Sustainable Growth Strategy insofar as seeking to achieve the housing requirement through a range of housing opportunities. This includes the co-locating of housing and employment growth, with a focus on established business parks and industrial estates.

Paragraph 5.14 notes that "where appropriate, the broad principle is that the spatial strategy should look to ensure that new housing is in places where employment opportunities already exist or are proposed." Catesby supports this principle, noting that the Llandow Airfield site offers the potential to deliver co-located residential and employment opportunities at scale, as identified within the promotion document submitted in support of its response to the call for Candidate Sites. This will remain a key aspiration of the site's future promotion via the emerging SDP.

However, Catesby reiterates that the housing requirement for the Vale should be higher, accounting for the aspirations of Future Wales for the area and the latest population and household projections. A more ambitious Growth Strategy is needed to accommodate this increased housing requirement.

POLICY FRAMEWORK

Policy SP1 - Sustainable Growth Strategy reiterates that the Plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that, outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.

In order to ensure that the minimum target figure is met, it is important that the Plan identifies a sufficient number of sites / housing allocations to meet both the short and longer term development needs. As previously stated, Catesby SUPPORTS the overall growth strategy across the Vale of Glamorgan contained in the Deposit RLDP. However, it is questioned whether or not there is sufficient land allocated to deliver the growth required.

Of the overall housing target of 7,890 dwellings, approximately half of these are to be delivered via rolled forward allocations and extant consents. Whilst some such sites can be expected to come forward, Catesby would caution against the over-reliance on delivery of historically allocated sites.

Catesby suggests that VoGC considers the inclusion of additional sites to deliver the predicted growth strategy identified in the RLDP. This will strengthen the land supply position ensuring a robust RLDP can be adopted which has the ability to ensure the delivery of the necessary growth. Catesby supports growth along the 'Connectivity' corridor, particularly in Minor Rural Settlements such as Llandow to assist with this.

Policy SP2 – Settlement Hierarchy broadly distributes development in line with the hierarchy of settlements, reflecting the role and function of places and directing growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision. Llandow is identified as a Minor Rural Settlement, new development associated with which should be mainly limited to infill opportunities and small-scale affordable housing led schemes (sites of up to 25 dwellings with a minimum of 50% affordable provision).

Catesby would suggest that specific sites in and around all settlement types may be suitable for a greater level of development than that suggested by the settlement hierarchy, and these should be explored accordingly. As part of this, Catesby SUPPORTS the recognition in the Policy Framework that the existing services and facilities in and around the Minor Rural Settlements should be safeguarded, supported and enhanced, and that in order to do this, growth should still be balanced in a way which supports these rural communities (Paras 6.16 and 6.17).

Policy SP3 – Development in the Countryside is clear that development will only be permitted in the countryside where it falls within one of the specified uses. This only includes Affordable Housing Exception Sites in respect of housing development. Catesby suggests that further development sites are required across the Vale in order to meet the Council's housing requirement, which should consider locations within the countryside where appropriate.

Catesby reiterates that the co-location of housing with existing infrastructure and facilities will be crucial to achieving the overall Growth Strategy of the RLDP. Development in and adjacent to Minor Rural Settlements is also key to this, especially those located in proximity to the 'Connectivity' corridor on the Key Diagram.

Catesby SUPPORTS development within these locations, particularly at Llandow. This is key in order for the Vale of Glamorgan to achieve part of its overarching vision, which states that "growth within rural settlements has provided for the needs of residents and supports balanced multi-generational communities that contribute to the vibrancy of the rural area".

SUMMARY

We trust that the above representations can be considered duly made and look forward to receiving confirmation accordingly. Catesby welcomes the opportunity to comment further as the RLDP progresses through to adoption. Catesby looks forward to engaging with the Council over the months ahead to continue a dialogue regarding the future delivery of development at Llandow. If you require any further information, please do not hesitate to contact me on the details below.

Change suggested by respondent:

Catesby suggest that the level of growth is too low, taking into account the aspirations of Future Wales for the area and the latest population and household projections, which suggest a higher level of need is required for the Vale.

Sound: Not specified

Attachments:

Redacted Representation Form - https://valeofglamorgan.oc2.uk/a/3cc
Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/4sn

6899 Object

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Barratt Redrow Homes [2669]
Agent: Boyer Planning

Summary:
Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic underdelivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

Full text:
1. INTRODUCTION
1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.
1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:
• Section 3 – The Vale of Glamorgan Key Characteristics;
• Section 4 – RLDP Key Themes, Vision, and Objectives;
• Section 5 – Sustainable Growth Strategy; and
• Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.
1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS
Settlement Pattern
2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.
2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Need
2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
3. RLDP KEY THEMES, VISION, AND OBJECTIVES
3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.

Key Themes
3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY
Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well

above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of

public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
5.10 For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
5.11 More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

5.12 Whilst Barratt Redrow appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range, having reviewed the Deposit Plan evidence base Barratt Redrow believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
5.13 In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
5.14 Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
5.15 In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
5.16 In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need. Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036) and therefore is made up of

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.
5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.

5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.
5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.
5.27 In summary, Barratt Redrow acknowledge the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
5.28 These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance and additional site allocations, such as Swn Y Coed, Wenvoe, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
5.29 Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.
5.30 Accordingly, despite Wenvoe being identified as a primary settlement, Policy SP2 notes that development in this location will be limited to 'the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.' Similarly, it is noted that Policy SP2 does not consider Wenvoe to be an appropriate location for ''substantial additional growth''.
5.31 Barratt Redrow object to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified.
5.32 First of all, the Deposit Plan acknowledges that it performs a similar function to the Primary Settlements located within the Strategic Growth Area and it is described as one of the 'sustainable communities' in The Vale of Glamorgan Key Characteristics section, as noted previously in Section 3.
5.33 Likewise, the site benefits from excellent accessibility the local public transport network, active travel routes and local services. These characteristics fully accord with Welsh Government's strategic objectives and emphasise the fact that Swn Y Coed constitutes an appropriate location for future housing.
5.34 With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge''. Barratt Redrow do not consider this to be sufficient justification to discount the site from allocation as there would be limited impact on BMW agricultural land arising from the development of Swn Y Coed.

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available.
5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.
Policy SP4 - Placemaking
5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.
5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.
5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.
5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.
5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality

sustainable design.
Policy PGD1 – Creating Well Designed and Inclusive Places
5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:

• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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Unsustainable Location & Poor Connectivity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.
• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live

application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.
• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.
• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.
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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply
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• HG1 (8) St Athan - Clive Road, St Athan

Policy HG3 – Housing Led Redevelopment Opportunity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to

accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).
• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4).Finally, the Council's own Viability Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.
• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning

permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.
• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:
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Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:
i. Space heating demand less than or equal to 40kWh/m2/year;
ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.
• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
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Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.

• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established 'defensible' limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be 'largely shielded from view by woodland blocks/strips'.
• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for 'infilling' the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.
• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
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Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it

difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
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Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.
• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
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MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
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• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
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Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the

wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
•

CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the Council's vision for the VoG.
• 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
• 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
•

6. CONCLUSION
• Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.
• Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swn Y Coed, are necessary to ensure the RLDP is able to effectively meet
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Barratt Redrow welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Barratt Redrow support the requirements for affordable housing in new development. In its current form the proposed policies SP7 and SP8 lack sufficient flexibility for site specific circumstances and physical constraints which may impact upon delivery. This inevitably creates uncertainty for a number of sites, where the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities.
• From a planning perspective it is also important to recognise the additional benefits the site (Candidate Site Ref No. 437) could provide in accommodating the increased housing need generated by the suggested 15% flexibility allowance within a highly sustainable location. The principles of which clearly align with the Council's aspirations and would maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport

Change suggested by respondent:

Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3ch

6904 Comment

Document Element: SP6 - HOUSING REQUIREMENT, Table 2: Housing Supply

Respondent: Barratt Redrow Homes [2669]

Agent: Boyer Planning

Summary:

Existing land supply - The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

Windfall - The Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. We do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036, but it is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year. periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites.

Full text:

1. INTRODUCTION

1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.

1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:

- Section 3 – The Vale of Glamorgan Key Characteristics;
- Section 4 – RLDP Key Themes, Vision, and Objectives;
- Section 5 – Sustainable Growth Strategy; and
- Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.

1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):

- Test 1 – Does the Plan Fit?
- Test 2 – Is the Plan Appropriate?
- Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS

Settlement Pattern

2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.

2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".

2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

Housing Need

2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.

2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is

particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
3. RLDP KEY THEMES, VISION, AND OBJECTIVES
3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.
Key Themes
3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY

Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus

corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
5.10 For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is

predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

5.11 More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

5.12 Whilst Barratt Redrow appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range, having reviewed the Deposit Plan evidence base Barratt Redrow believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.

5.13 In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

5.14 Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).

5.15 In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

5.16 In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need. Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036) and therefore is made up of

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.

5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This

accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.

5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.

5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.

5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.

5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.

5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.

5.27 In summary, Barratt Redrow acknowledge the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

5.28 These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance and additional site allocations, such as Swn Y Coed, Wenvoe, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

Policy SP2 – Settlement Hierarchy

5.29 Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.

5.30 Accordingly, despite Wenvoe being identified as a primary settlement, Policy SP2 notes that development in this location will be limited to 'the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.' Similarly, it is noted that Policy SP2 does not consider Wenvoe to be an appropriate location for ''substantial additional growth''.

5.31 Barratt Redrow object to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified.

5.32 First of all, the Deposit Plan acknowledges that it performs a similar function to the Primary Settlements located within the Strategic Growth Area and it is described as one of the 'sustainable communities' in The Vale of Glamorgan Key Characteristics section, as noted previously in Section 3.

5.33 Likewise, the site benefits from excellent accessibility the local public transport network, active travel routes and local services. These characteristics fully accord with Welsh Government's strategic objectives and emphasise the fact that Swn Y Coed constitutes an appropriate location for future housing.

5.34 With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge''. Barratt Redrow do not consider this to be sufficient justification to discount the site from allocation as there would be limited impact on BMW agricultural land arising from the development of Swn Y Coed.

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available.

5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.

Policy SP4 - Placemaking

5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.
5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.
5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.
5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.
5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
Policy PGD1 – Creating Well Designed and Inclusive Places
5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.

5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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Unsustainable Location & Poor Connectivity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 &

Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.
• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.
• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.
• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.
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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply

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• HG1 (8) St Athan - Clive Road, St Athan

Policy HG3 – Housing Led Redevelopment Opportunity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.

• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).
• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4).Finally, the Council's own Viability Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of

coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.
• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.
• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:
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Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:
i. Space heating demand less than or equal to 40kWh/m2/year;
ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.
• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
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Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and

based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established 'defensible' limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be 'largely shielded from view by woodland blocks/strips'.
• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for 'infilling' the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.
• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
•

Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.

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• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
•

Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.
• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
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MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
•
• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact

upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
•
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• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
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CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the Council's vision for the VoG.
• 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
• 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
•

6. CONCLUSION
• Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.
• Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swn Y Coed, are necessary to ensure the RLDP is able to effectively meet
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Barratt Redrow welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that

it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Barratt Redrow support the requirements for affordable housing in new development. In its current form the proposed policies SP7 and SP8 lack sufficient flexibility for site specific circumstances and physical constraints which may impact upon delivery. This inevitably creates uncertainty for a number of sites, where the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities.
• From a planning perspective it is also important to recognise the additional benefits the site (Candidate Site Ref No. 437) could provide in accommodating the increased housing need generated by the suggested 15% flexibility allowance within a highly sustainable location. The principles of which clearly align with the Council's aspirations and would maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport

Change suggested by respondent:

The RLDP should incorporate a greater flexibility allowance to provide certainty that any shortfalls/fallow periods are offset and enable a more consistent supply of homes to be achieved over the plan period as a whole.

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3ch

7040 Object

Document Element: SP6 - HOUSING REQUIREMENT

Respondent: Marion morgan [2413]

Agent: Geraint John Planning Ltd

Summary:

We would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.
It considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ystradowen area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Ystradowen. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para

3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months
• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory

is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious

questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:
Table 6: Existing LDP allocations to be carried forward

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.
Extract of Housing Trajectory (annotated by GJP - red dotted line)

It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in

these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.
Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.
HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.
Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.
It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land at Ystradowen (Site ID: 430 / 4060) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) and Annex 2 for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 230 affordable homes in the Cowbridge housing market area / ward - which Ystradowen is located within. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation – see Annex 2.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ystradowen and the proposed site. As outlined within these representations, it is considered that the site (ID 430) represents a sustainable, deliverable and acceptable site. The site is located within 2.7 miles Cowbridge and 2.8 miles of Pontyclun. Due to the availability of frequent bus services, and active travel links, key services are readily available to access for any residents within Ystradowen without the need to travel by car. The site is within a maximum 9- and 14-minute bus journey (respectively) of the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Accordingly, the settlement of Ystradowen represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ystradowen, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.
As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 "For the purposes of this policy, 'small-scale' will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."
The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.
SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

Deliverability of the Site

In summary, the site seeks to deliver the following key elements:

• Provision of circa 67 new-build residential dwellings (including 50% affordable housing provision);
• A mix of house-types and tenures across the site to cater for a variety of needs;
• Creation of a new primary access into the site;
• Connection to pedestrian links within the wider area;
• Public open space; and
• Green Infrastructure; and
SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst

embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

Land at Ystradowen (Site ID: 4060)

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site. The 'Candidate Sites Assessment Deposit Plan Stage v2' for 'Land at Ystradowen (Site ID: 4060)' sets out that the position of the site at the Deposit Stage is as follows:

"Amendment of proposed use from housing to affordable housing led. Previous site reference 430. The original assessment concluded that whilst the site was adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.
The LDP site in question has subsequently been granted planning permission for housing. This site will serve the future needs of residents in the area and it is not considered that additional land should be allocated in this location."

In terms of the first paragraph, the assessment/conclusion implies and suggests that 'Land at Ystradowen' (4060)' does not adjoin the existing LDP settlement boundary as the allocated site ('Land off Sandy Lane, Ystradowen') has not been built out – "by virtue of an existing adopted plan LDP allocation this is currently under review". Detailed representations have been made and submitted previously at the Housing Trajectory (see Appendix B& C) that outlines that this is fundamentally incorrect. This is not repeated in full here, with just the main points re-iterated.

First and foremost, 'Land at Ystradowen (4060)' directly adjoins the existing LDP settlement boundary. Secondly, there has been a significant change in the position and circumstances. The allocated site ('Land off Sandy Lane, Ystradowen') is currently being "built out", with work commencing on site (see photographic evidence in Appendix C)
- post the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024). Accordingly, the site no longer adjoins "the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review". Given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.

With regards to the second paragraph, the assessment/conclusion outlines that "The LDP site … will serve the future needs of residents in the area and it is not considered that additional land should be allocated in this location". The arguments and case presented in Appendix B & C. There is a clear overreliance on 'rolled forward' sites / existing allocated sites. A total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%). We believe that a greater level of growth is achievable and should be considered. Not least as there is an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings). As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy. Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply. The "future needs of residents in the area" will therefore not be met/served by just this site, and it is considered that additional land should be allocated in this location.

Furthermore, to reinforce, illustrate, and evidence the point in specific reference to the site the subject to this representation (located in Ystradowen), reference is made to application ref. 2013/00856/OUT – 'Land off Badgers Brook Rise, Ystradowen'. The Final Report of the application states that "Ystradowen is considered a sustainable settlement for further housing development" – i.e. "additional land should be allocated in this location".

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan (see Appendix B), a similar 'scoring' exercise has been undertaken as part evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage can be seen below for reference:
BP18 Candidate Ste Assessment at Preferred Strategy Stage
As demonstrated above, there has been a positive change to the scoring attributed to the site ('Land at Ystradowen'). The change is a positive change to the 'Infrastructure Availability' section changing from: 'Grey' (no score) to 'Amber'. Infrastructure Availability is outlined as: "Existing or proposed services would be suitable subject to local improvements

without impacting on development viability and/or delivery timescales" (see below):
The explanation for the scoring provided by the Vale sets out that "Sites will be assessed against the availability of water connections to the site, in addition to the method of foul sewage disposal from the site. Consultation shall be undertaken with DCWW to determine whether there is sufficient capacity to the wastewater treatments works, and how it links into DCWW's Capital Investment Programme.
Where consultation indicates limited capacity, or the site is located away from a viable connection this may impact on the deliverability/viability of a site should this require significant connection costs or upgrades. Consequently, the Council shall require site proposers to undertake detailed site viability assessment to determine the impact that additional cost shall have on development cost and deliverability timescales."

As set out above, this is a positive change. This is most likely derived from the allocated site ('Land off Sandy Lane, Ystradowen') currently being "built out", with work commencing on site that would facilitate and improve the 'Infrastructure Availability'. This re-iterates the point made previously re the incorrect assessment reached, and the ever changing position of this site – which will only improve given the neighbouring allocated site ('Land off Sandy Lane, Ystradowen') being "built out".

Land West of Maendy Road, Aberthin (Site ID: 2299)

There are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and the site the subject of these representations. It is therefore considered pertinent to assess and compare the suitability of 'Land West of Maendy Road, Aberthin'. Not least as 'Land at Ystradowen (Site ID: 4060)' is for a "small-scale affordable housing led development in a minor rural settlement", within "the ward of Cowbridge".

The site 'Land West of Maendy Road (Site ID: 2299)' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however from our review of the evidence base submitted as part of the Housing Trajectory consultation, there was no assessment and critique of this site at this stage. This raises questions regarding the "soundness" of this site, given it appears this sites acceptability and inclusion was pre-determined.

The site ('Land West of Maendy Road') has since had a detailed assessment and critique published, however concerns still remain regarding the "soundness" of the site which forms part of the intended housing land supply. The 'Stage 2 Detailed Site Assessment' summary undertaken for 'Land West of Maendy Road' has been extracted below:

"The site is proposed for a small-scale affordable housing led development in a minor rural settlement, which would accord in principle with the strategy. Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent.
The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that."

As mentioned previously, there are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)' (the subject of these representations). Firstly 'Land at Ystradowen (Site ID: 4060)' is also for a "small-scale affordable housing led development", that is "in a minor rural settlement" (Ystradowen). Accordingly, it should follow that as 'Land West of Maendy Road, Aberthin (Site ID: 2299)' "would accord in principle with the strategy", 'Land at Ystradowen (Site ID: 4060)' would also "accord in principle with the strategy".

Furthermore, there is no material difference between the following assessment of Aberthin and Ystradowen:

"Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent."

There is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms.

As set out in our representations to the Preferred Strategy, we reviewed the key services in proximity to the site. The following services were identified as part of that review:

• In terms of public transport, there are two bus stops located approximately 0.2 miles (4-minute walk) from the site ('Land West of Maendy Road'), with the 321 providing services between Llantwit Major and Talbot Green;

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin;

• The site is also located 0.2 miles (4-minute walk) from The Farmers Arms Pub and 0.2 miles (4-minute walk) from The Hare and Hounds Inn; and

• The site is located 0.2 miles (5-minute walk) from Aberthin Village Hall.

Given the above, “The settlement (Ystradowen) is also served by public transport”.
Furthermore, Ystradowen is located only 2.7 miles from Cowbridge (9-minute bus journey). The “primary and secondary school provision with the wider range of services and facilities in Cowbridge” mentioned in relation to Aberthin are therefore also in close proximity to Ystradowen.

Given the above, any candidate site at ’Land at Ystradowen’ (the subject of these representations – Site ID: 430 / 4060) is no less sustainable than the site at Aberthin (Site ID: 2299).

Not least as the following additional key services are located within Ystradowen and therefore in close proximity to the promoted site:

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as ‘Ystradowen Children’s Park’, and the 3/4G Sports Pitch at ‘Ystradowen Petanque Club’; and
• Furthermore, the site is located 480m (7-minute walk) from the ‘Murco – Tudor Garage’ which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Furthermore it is important to note that the above scoring criteria is very limiting, and does not take into account the important role and proximity of settlements in a wider context. For example, it does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant) – see Appendix B for full details.

In addition, as set out within the representations made in relation to the House Trajectory (Appendix C), the following extracts have been taken from the Officer’s Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - ‘Land off Sandy Lane, Ystradowen’ (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:
As set out above, it is important to note that the Final Report of application ref. 2013/00856/OUT states that “Ystradowen is considered a sustainable settlement for further housing development”, due to “the sustainable nature of the settlement”. Furthermore, the Final Report of app ref. 2023/00948/FUL states:

• “Notwithstanding this, the site is located in close proximity to local services and there is a bus stop located nearby. Whilst the comments relating to the reliance and frequency of the bus services have been considered, there still remains a bus service in the area”; and
• “Firstly, as aforementioned, many neighbouring comments refer to the site as unsustainable and have commented on the suitability of public transport and cycle routes etc. This has been addressed above.”

The above clearly evidences that the location has previously been endorsed as, and is currently still found to be, sustainable.

Accordingly, it can be considered therefore that if the proposed allocated site ‘Land West of Maendy Road, Aberthin (Site ID: 2299)’ is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, ‘Land at Ystradowen (Site ID: 430 / 4060)’ is equally suitable to be an Affordable Housing Led Allocation.

The second section/paragraph of the assessment states:

“The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that.”
‘Land at Ystradowen (Site ID: 4060)’ is also located within “the ward of Cowbridge”. As per the above and outlined by the Authority, there is “a need for 230 additional affordable units over the next 15 years”. It is clear therefore that there is a need for additional affordable units in this ward, and this site would therefore also help to alleviate this need.

This position is a direct contradiction of course of the assessment/conclusion for ‘Land at Ystradowen (Site ID: 4060)’ which stated “it is not considered that additional land should be allocated in this location”. It is clear from the above however that “additional land should be allocated in this location” to satisfy this “need for 230 additional affordable units over the next 15 years” – which ‘Land at Ystradowen (Site ID: 4060)’ can do. This is not least the case given the detailed arguments, case and representations presented and evidenced previously above and in Appendix B & C.
To briefly reiterate there is a clear overreliance on ‘rolled forward’ sites / existing allocated sites which has resulted in the unmet need deriving from the existing LDP being still present. A greater level of provision for new allocations should therefore be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply, so these can “make an important contribution in meeting” the “need for 230 additional affordable units over the next 15 years” in “the ward of Cowbridge” – which ‘Land at Ystradowen (Site ID: 4060)’ can do.

As set out within the representations made in relation to the housing trajectory (see Appendix C), a further key consideration to note and one which does differentiate between the relative merits of the ‘Land at Maendy Road, Aberthin’ and ‘Land at Ystradowen’ is that the LDP Proposals Map demonstrates that ‘Land West of Maendy Road’ is within a Special Landscape Area - see below:

Vale of Glamorgan Proposals Map (Land West of Maendy Road outlined in red
Under Policy MG17 'Special Landscape Areas' it is considered that development in SLA could pose an "unacceptable harm to the important landscape of the area". Accordingly, this development and proposed allocation could therefore cause "unacceptable harm to the important landscape of the area".

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any "unacceptable harm to the important landscape of the area".
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)
It is noted that the detailed assessment scores the site 'amber' in respect to Special Landscape Area (refer to / see later section for full details), with the assessment methodology setting out that "the site is located within a Special Landscape Area/The Glamorgan Heritage Coast and the development may result in little or no change in character and little or no significant effect on landscape character and visual amenity."
A detailed assessment of the impact upon the SLA in respect to the development of 'Land West of Maendy Road, Aberthin' should therefore be, and will need to be, undertaken as part of any planning application. If it is found that the site causes "unacceptable harm to the important landscape of the area", this will lead to this proposed allocation being at risk of not being delivered. This will be as a result of its impacts and acceptability at the planning application stage that the landscape and visual impact of development of the site is unacceptable. As such, these proposed affordable units are at a potential considerable risk of being lost and not satisfying the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" – which 'Land at Ystradowen (Site ID: 4060)' can do as it is not located in an SLA.

In addition the draft housing trajectory set out that "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" is not provided for. This is clearly an issue. Given however 'Land at Ystradowen' does not sit within a SLA – and so not pose any potential concern or cause any "unacceptable harm to the important landscape of the area" – the allocation of this site would be more suitable and "safer" - as there would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for, and the need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" would be satisfied.

As mentioned previously, a detailed assessment and critique has now been undertaken of 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part evidence base for the Deposit Plan using the similar 'scoring' exercise. As such, it is again pertinent to consider and respond to the Council's 'scoring' exercise assessment of the site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part of these representations.

The 'Summary of Assessment of New Candidate Sites' table can be seen overleaf for reference:
BP18A Candidate Site Assessment at Deposit Plan Stage
A comparison between the site assessments undertaken for both 'Land West of Maendy Road, Aberthin (Site ID: 2299)' (on the left), and 'Land at Ystradowen (Site ID: 4060)' (on the right) has been undertaken, and can be seen below for reference:

Having undertaken a review of the scoring for both 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)', it is clear that 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)':

• 'Land at Ystradowen (Site ID: 4060)': 17/33 criteria are scored green = 52%

• 'Land West of Maendy Road, Aberthin (Site ID: 2299)': 12/34 criteria are scored green = 36%

It is clear therefore given the above that 'Land at Ystradowen (Site ID: 4060)' is a better site, and should be allocated accordingly.

One key example to note is how the criterion 'Access to Services and Facilities' has been scored. For 'Land at Ystradowen (Site ID: 4060)' this has been scored green, yet for 'Land West of Maendy Road, Aberthin (Site ID: 2299)', this has been scored red. Given this, this corroborates the position outlined previously above that, if the proposed allocated site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen (Site ID: 430 / 4060)' is equally as sustainable – in fact considered more suitable (given its higher scoring in this respect).

Furthermore, we question the "soundness" of the assessment of 'Land West of Maendy Road, Aberthin (Site ID: 2299)', given that 7/34 (21%) of the criteria do not appears to have not been assessed – i.e. 7/34 (21%) of the criteria are scored grey. This raises questions regarding the "soundness" of this site, given it appears this sites acceptability and inclusion was pre-determined.

It is clear therefore that if 'Land West of Maendy Road, Aberthin (Site ID: 2299)' has been deemed acceptable for allocation, yet 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than this site, 'Land at Ystradowen (Site ID: 4060)' should also be deemed acceptable and be allocated. Not least as the site is "proposed for a small-scale affordable housing led development in a minor rural settlement … would accord in principle with the strategy", and "could make an important contribution in meeting "a "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge".

Summary and Conclusion

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Deposit Plan published as part of the consultation.

In terms of SECTION 4, and a response to the Candidate Site Assessment at Deposit Plan Stage, the following key points have been made:

• The Council's 'Stage 2 Detailed Site Assessment' justification for 'Land at Ystradowen (Site ID: 4060)' is fundamentally incorrect;

• Given the material positive similarities between 'Land at Ystradowen (Site ID: 4060)' and 'Land West of Maendy Road, Aberthin (Site ID: 2299)', which has been deemed acceptable and allocated, 'Land at Ystradowen (Site ID: 4060)' should also be deemed acceptable and allocated accordingly;

• 'Land at Ystradowen (Site ID: 4060)' would help to alleviate and satisfy "a need for 230 additional affordable units over the next 15 years" within "the ward of Cowbridge"; and
• 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)', and so should also be deemed acceptable and be allocated;

Ultimately, 'Land at Ystradowen (Site ID: 4060)' is "proposed for a small-scale affordable housing led development in a minor rural settlement", and as such "would accord in principle with the strategy". It would therefore "make an important contribution in meeting" the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge".

We would therefore object the Council's assessment that the site is not considered suitable for development.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Credentials of this site subject to this submission; and
10. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing-led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted

upon, namely:
Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the east of Coliwinston, Colwinston.

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicted in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.
Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.
The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.
Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.
Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;

• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:
Table 6: Existing LDP allocations to be carried forward
The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.
Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver

900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already

seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision.
Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".
As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision, and as such, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations

Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
Candidate Site Stage 2 Assessment (Site Ref. 404)
The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:
"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clearly evident deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question

whether this allocation is “sound” (i.e. its allocation is considered to be “unsound”).

Despite the absence of site-specific assessment criteria, as the RLDP preferred strategy states a key objective guiding site selection is that the Plan will “provide for vital and vibrant rural communities whilst protecting the countryside through the delivery of growth in sustainable locations related to the settlement hierarchy alongside the provision of supporting infrastructure” (Objective 7 ‘Fostering Diverse Vibrant and Connected Communities’), it is reasonable to assume that the Council considers ‘Land West of Maendy Road’ to be a ‘sustainable’ location.

Given this, we have reviewed the key services in proximity to the site. The following services were identified:

• In terms of public transport, there are two bus stops located approximately 0.2 miles (4-minute walk) from the site (‘Land West of Maendy Road’), with the 321 providing services between Llantwit Major and Talbot Green.

• The site is also located 0.2 miles (4-minute walk) from The Farmers Arms Pub and 0.2 miles (4-minute walk) from The Hare and Hounds Inn.

• The site is located 0.2 miles (5-minute walk) from Aberthin Village Hall.

Aberthin is in close proximity (1.2 miles/14-minute walk) to the key settlement of Cowbridge - which is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to ‘Land West of Maendy Road’:

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Considering this, there is no material difference between ‘Land West of Maendy Road’ and ‘Land at Ystradowen’ in sustainability terms. Given that Ystradowen is located only 2.7 miles from Cowbridge (9- minute bus journey), the candidate site at ‘Land at Ystradowen’ is no less sustainable than the site at Aberthin. The following key services are within Ystradowen and therefore in close proximity to the promoted site:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site (‘Ty Mawr Close’), with the ‘321 Nat Group Service’ providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves ‘Land West of Maendy Road’ / Aberthin.
• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as ‘Ystradowen Children’s Park’, and the 3/4G Sports Pitch at ‘Ystradowen Petanque Club’.

• Furthermore, the site is located 480m (7-minute walk) from the ‘Murco – Tudor Garage’ which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Accordingly, it can be considered therefore that if the proposed allocated site ‘Land West of Maendy Road, Aberthin’ is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, ‘Land at Ystradowen’ is equally suitable to be an Affordable Housing Led Allocation.
Furthermore, to reinforce the above position and to illustrate and evidence the site’s sustainability, the following has been taken from the Officer’s Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - ‘Land off Sandy Lane, Ystradowen’ (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:
Reference is made in the Final Report of app ref. 2013/00856/OUT which states that “Ystradowen is considered a sustainable settlement for further housing development”, due to “the sustainable nature of the settlement”.

Furthermore, the Final Report of app ref. 2023/00948/FUL states:

• “Notwithstanding this, the site is located in close proximity to local services and there is a bus stop located nearby. Whilst the comments relating to the reliance and frequency of the bus services have been considered, there still remains a bus service in the area.”
• “Firstly, as aforementioned, many neighbouring comments refer to the site as unsustainable and have commented on the suitability of public transport and cycle routes etc. This has been addressed above.”

The above clearly evidences that the location has previously been endorsed as, and is currently still found to be, sustainable.

A further key consideration to note and one which does differentiate between the relative merits of the ‘Land at Maendy Road, Aberthin’ and ‘Land at Ystradowen’ is that the LDP Proposals Map demonstrates that ‘Land West of Maendy Road’ is within a Special Landscape Area - see overleaf:
Vale of Glamorgan Proposals Map (Land West of Maendy Road outlined in red)
Under Policy MG17 ‘Special Landscape Areas’ it is considered that development in SLA could pose an “unacceptable harm to the important landscape of the area”. Accordingly, this development and proposed allocation could therefore cause “unacceptable harm to the important landscape of the area”.

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any "unacceptable harm to the important landscape of the area".
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)

This is a significant factor to consider. 'Land West of Maendy Road, Aberthin' causing "unacceptable harm to the important landscape of the area" will lead to this proposed allocation being at risk of not being delivered by virtue of detailed assessments of its impacts and acceptability at planning application stage holding that the landscape and visual impact of development of the site is unacceptable. As such 25 affordable units will be lost from the proposed affordable 122 units, and ultimately being lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" is not provided for. This is clearly an issue. Given however 'Land at Ystradowen' does not sit within a SLA – and so not pose any potential concern or cause any "unacceptable harm to the important landscape of the area" – the allocation of this site would be more suitable and "safer" - as therefore would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.
Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)
As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:
Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:
In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain

services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Ystradowen', the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below. With reference to the above:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green.

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities.

Furthermore, the settlement of Ystradowen has been ranked highly in the VoG Sustainable Settlements Appraisal, scoring a total of 14 points according to the distance to key services and facilities available. This places Ystradowen 26th out of a total of 87 settlements. As a result, this would be deemed a suitable area to accommodate growth.

As stated above the key settlement of Cowbridge is located in close proximity being only 2.7 miles to the south and a 9-minute bus journey. Cowbridge is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Furthermore, it is important to note that the above criteria does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant). These areas comprise for example the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Given the above, 'Land at Ystradowen' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Ystradowen' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.
Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref. 2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the

settlement in recent years.
Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Credentials of this site subject to this submission

There has been a significant change in the position and circumstances since the promoted site herein was assessed at Candidate Site Stage and the Assessment undertaken. The Stage 2 Assessment of the site concluded the following: 'Whilst adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.' The assessment/conclusion implies that as this site ('Land off Sandy Lane, Ystradowen') has not been built out and is "currently under review", it suggests that 'Land at Ystradowen' (430) does not adjoin the existing LDP settlement boundary. Given recent developments however associated with the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024) and the site being currently being "built out" and work commencing on site, the site no longer adjoins "the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review". Accordingly, and given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.
The following specific photo evidences 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48) is being built out the western boundary of the promoted Site ID 430. This therefore clearly highlights that the site's boundary is representing the existing settlement limit in the existing development plan. Accordingly, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the existing LDP settlement boundary.
Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gr
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3gt
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g4
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g7
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3g8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gv
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gc

7062 Object

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence.
Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. Additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends.
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6. In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements

with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:

"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."
The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.
5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.
In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing

requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary

specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.
Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part
Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.
That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.
There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix. The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.
In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.
Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.

The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.
8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part
Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.
The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;
• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.
The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period.

Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with

further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.

In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.

Policy CI1 – Open Space Provision

Position: Support in principle / Object in part

Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.

The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.

There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.

Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.

Policy SP4 – Placemaking

Position: Support in principle / Comment

Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.

That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.

Suggested wording amendment:

"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."

That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.

Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part

Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.

However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.

We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:

"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."

The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:

Impact upon Character and Setting of the St Nicholas Conservation Area

Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.

The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:

• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;

• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;

• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and

• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.

Countryside Impacts

The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.

The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.

Agricultural Land Quality

Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.

As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.

Appendix 2 – Summary of Assessment

We comment on the Council's Summary of Assessment as follows:

• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.

• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.

• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.

• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.

• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.

• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.

• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.

• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7063 Object

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued. Windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery and rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and

sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly

recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.

For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.

Policy SP2 – Settlement Hierarchy Position: Object

Barratt Redrow objects to Policy SP2 in its current form.

The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.

That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.

However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.

The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.

In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.

Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.

Policy SP6 – Housing Requirement Position: Object

Barratt Redrow objects to Policy SP6.

Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.

PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:

"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."

The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:

"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.
5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.
In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and

redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.

The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.

The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a

1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.

Policy SP6 – Flexibility, housing land supply and trajectory Position: Object

Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.

The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.

In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.

The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.

The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.

Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.

The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.

There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from

large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.
Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part
Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.
That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.
There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.
The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.
In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.
Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.
The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to

a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.

8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.

The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.

Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:

• the Plan is overly reliant on a small number of key sites;

• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;

• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and

• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.

The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.

Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.

The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:

• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.

• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.

• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.

All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.

In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.

Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part

Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements

where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability,

Project Zero contributions and practical implementation.
Policy CI1 – Open Space Provision
Position: Support in principle / Object in part
Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.
The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.
There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.
Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part

Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is

considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment
We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with

National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

Increase flexibility allowance.

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7091 Object

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Barratt Redrow Homes [2669]
Agent: Turley

Summary:

Based on Welsh Government's 2022-based household projections and the DPM, the number of overall dwellings identified will not meet the identified housing growth needs of VoG for the RLDP period. The Council should review the position in terms of the updated household projections. In order to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery that reflects the most up to date evidence and align with Future Wales and the Vale's identified role as a National Growth Area.

Full text:

Policy SP1 - Sustainable Growth Strategy
Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.
It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of

the identified need for affordable homes in VoG for the RLDP period.
In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"
Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be concentrated is supported.

Policy SP2 - Settlement Hierarchy
The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable. As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Policy SP4 - Placemaking
We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.
The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses... ' or to be developed at 'high densities... and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.
Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Policy PGDl - Creating Well Designed and Inclusive Places
There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align

with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be

reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy CII - Open Space Provision
The wording of Policy CII, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy CII should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy CII requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:
Amend to accommodate a greater level of housing delivery.

Sound: Not specified

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7092 Comment

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Barratt Redrow Homes [2669]
Agent: Turley

Summary:

The provision of a flexibility allowance is supported, but it should be increased to 15%. A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth.

Full text:

Policy SP1 - Sustainable Growth Strategy
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The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that

contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be

assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy Cll - Open Space Provision
The wording of Policy Cll, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy Cll should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy Cll requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

Higher flexibility allowance.

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7140 Object

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Peter Stone Properties Ltd [1182]
Agent: Geraint John Planning Ltd

Summary:

We would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.
It considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £800,000 over the last 12 months, there is a clear and established need for new homes in the Bonvilston area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of

further sites within the Minor Rural Settlements, such as Bonvilston. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley

Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and

will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites – not least given that 3 of the 4 allocated affordable housing-led sites are located west of Cowbridge.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land South of A48, Bonvilston (Site ID: 435 / 3857) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area (which Bonvilston is located within), and a need for 242 affordable homes in the Wenvoe housing market area. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

Securing further delivery of Affordable Units

As set out above, it can be assumed that the affordable housing-led allocated sites only provide 61no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings

(including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included

within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to meet the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Bonvilston and the proposed site. As outlined within these representations, it is considered that the site (ID 435 / 3857) represents a sustainable, deliverable and acceptable site. This proposed allocation is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

• Cowbridge Comprehensive School;
• St Nicholas Primary School;
• Cowbridge Health Centre; and
• Cowbridge town centre for various Retail Services.

Accordingly, the settlement of Bonvilston represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Bonvilston, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a ‘cap’ of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a ‘cap’ limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 “For the purposes of this policy, ‘small-scale’ will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites

with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area.”

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further

development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

Deliverability of the Site

In summary, the site seeks to deliver the following key elements:

• In summary, the opportunity of the site seeks to deliver:
• Residential development comprising up to 25 dwellings, with at least 50% affordable housing in accordance with Policy SP2,
• Highways infrastructure within the site;
• Upgraded access to the site;
• Strong legible pedestrian and cycle connections throughout the site and with the existing settlement;
• Green Infrastructure; and
• Sustainable Drainage Systems (SuDS).

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land South of the A48, Bonvilston (Site ID: 3857) sets out that the position of the site at the Deposit Stage is as follows:

"Notwithstanding the amendment from a market led to an affordable housing led scheme (original CS 435), the other reasons why the site was previously discounted still remain.
The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area.

Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48. The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable. There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing."
Conservation Area
In terms of the assertion that "The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area, this is strongly disputed.

Whilst it is acknowledged that the site lies within the Bonvilston Conservation Area, the conclusion that it would be adversely affected is not considered to be accurate. Firstly, the site as it currently stands, consists of an open field. This does not match the conservation area which is characterised primarily by residential dwellings of varying densities, and as such, it is considered that development of the site with sensitively designed buildings would enhance as opposed to harming its surroundings.

Secondly, the large residential development to the north of the site, 'Land at Sycamore Cross' ref. 2015/00960/FUL encroaches on the Bonvilston Conservation area but was deemed acceptable by the LPA. Although not all of the site is within the Conservation Area, it's encroachment and presence adjoining and surrounding a large proportion of the area is considerable and was deemed acceptable by Officers in 2017. Given this, a development at the Land South of the A48 should be deemed acceptable, as it follows the same principles albeit at a much smaller scale.

Highways
As for the statement that "Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48", this is also strongly disputed.

The site is located immediately adjacent to the adopted highway where it is proposed to upgrade and enhance the existing gated access point. Due to the existing access point, it is not considered that 'major' highway mitigation works would be needed, rather this would be enhanced and improved as part of the proposed development. Furthermore, given the nature of the road, with long views extending in both directions, it is anticipated that appropriate visibility

splays could be achieved to enable safe access and egress. As such, it is considered that the site would achieve appropriate highway access within the need for "major" highway mitigation works.

Agricultural Land Classification
The Detailed Site Assessment also sets out that "The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable." This is strongly disputed.

A review of the Agricultural Land Classification Predictive Map indicates that the site lies primarily within 'Grade 2: Very good quality agricultural land' but no Grade 1 land is present. Further assessment and tests to establish the quality would therefore be undertaken in due course to confirm the quality of the land. However, it is not considered that it would be suitable to farm in any event given the location immediately adjoining existing residential development and the fact that it is within private ownership. Overall, given that the site is relatively small with a gross area of 0.88 hectares, it is not considered that its development would result in a detrimental or significant loss of agricultural land – not least given that site is not capable of beneficial agricultural production due to its limited size.

Housing / Housing Land
Further to the above, it is also set out that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing", however, this is not considered to be entirely accurate.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area and a need for 242 affordable homes in the Wenvoe housing market area. This need has not been met through the allocations of sites within the RLDP, nor has it been met through outstanding commitments.

As outlined in Annex 1, it can be assumed that the affordable housing-led allocated sites will only provide for 61no. affordable dwellings within the Rural Vale, comprising 4no. sites that are expected to deliver approximately 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. Therefore, more sites should be allocated in order to secure the delivery of a higher number of affordable housing units to meet the target.

As set out within Annex 1, it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, however, there is serious concern regarding the deliverability of these sites, which would result in a significant gap in the total affordable housing that is delivered. Therefore, allocating a greater number of affordable housing-led sites would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in the both the overall affordable housing need, and the need for the St Nicholas & Llancarfan housing market area, being unmet, with demand continuing to outstrip supply.

The LHMA 2023 sets out the existing stock and planned supply of affordable housing over the next 5 years (up until 2028). This assessment found that the housing market area of St Nicholas & Llancarfan has a committed supply of 4no. one beds, 11no. two beds, and 3no. three beds, with 2 no. three beds as expected re-lets. The assessment also identifies a committed supply of 39no. units for intermediate housing.

The LHMA also sets out the existing stock and planned supply for Wenvoe, identifying the committed supply of social rent homes to be 12no. one beds, 11no. two beds, and 5no. three beds, with 7no. one beds and 8no. two beds as expected re-lets. There is no committed supply for intermediate housing in Wenvoe.

It should be noted that the development of 'Land East of Nicholas' (Campbell Court and Cae Newydd), has now been completed, and as such, can not form part of the housing land available. The latest Pre-Application Response for the site subject to these representations (Land South of the A48, Bonvilston) accounted for the development of the site in

St Nicholas, stating that "even after the developments at St Nicholas and Culverhouse Cross, there was the need in the Wenvoe ward for 1 Bed 71, 2 Bed 49, 3 Bed 29, 4 Bed 7, 5 Bed 5, Total 161".

It should also be noted that there are existing commitments within the Bonvilston area ('Land to the east of Bonvilston'), however, the deliverability of the existing commitment is seriously questioned. Application Ref. 2015/00960/FUL was approved in July 2017, with the Housing Land Supply and Housing Trajectory Report (December 2025) confirming that of the total 120 units permitted, only 40 had completed by 1st April 2025, with the remaining 80 units not started by this same date. Of the 80 units not started, 25 units are affordable homes.

It is well known that phase 1 of the development at 'Land to the east of Bonvilston' has faced difficulties which has led to the development remaining incomplete. This does of course put into question the overall deliverability of the site, and raises concerns about the units that were, and still are, required within the Bonvilston area.

The allocation of the site promoted herein would not only help in the short term in meeting the overall affordable housing target for the Plan, but would also assist in meeting the unmet needs of affordable housing within Bonvilston – not least given the serious concern regarding the deliverability of the committed supply of housing within the St Nicholas & Llancarfan housing market area.

For the reasons set out above, and in light of the information provided within the LHMA 2023 and the Housing Land Supply and Housing Trajectory Report (December 2025), it is evident that there is considerable need for affordable housing within Bonvilston, and accordingly, the housing market areas of St Nicholas & Llancarfan, and Wenvoe. There have not been any sites allocated to assist within meeting the local need, and more sites should be allocated in order to secure delivery of a higher number of affordable housing units to meet the overall target of the Plan.

The contention that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing" is therefore strongly disputed – not least given that there is a clear and evident need to allocate more affordable housing-led sites in order to meet the target set out in the Plan.

Interim Summary

In summary, it is considered that the site subject to these representations would not have an adverse impact on the character and setting of the Bonvilston Conservation Area, nor would major highway mitigation works be required to enable safe vehicular access on to the A48. Moreover, it is considered that the site's classification as BMV Agricultural Land does not pose a fundamental constraint to development – as the site represents a relatively small parcel with a gross area of 0.88 hectares, which is not capable of beneficial agricultural production due to its limited size.

There is also a considerable need for the affordable housing in Bonvilston and the housing market area of St Nicholas & Llancarfan. The site promoted herein would assist in meeting these local needs and should be allocated accordingly.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage

As demonstrated above, there has only been one change to the scoring attributed to the site, this being a change from 'red' to 'amber' for 'Developer Interest'. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with these representations accordingly (see Appendix B).

Whilst detailed submissions were made on the previous assessment, it is considered pertinent for the scoring of the key criteria's to be addressed as part of these representations. As such, these have also been discussed below.
Developer Interest

As set out above, the Detailed Site Assessment for 'Developer Interest' has changed from 'red' to 'amber'. The assessment methodology for this section of the assessment has been extracted below for reference.

As set out above, 'amber' refers to there being no development interest identified at this stage, however, there is evidence to indicate that the site is being actively promoted by the owners.

The representations made to the Preferred Strategy (Appendix B) sets out that whilst the site does not yet have an agreement with a developer to take on the land, it is considered that this would be achieved should the site be allocated, and planning permission granted. Newydd Housing association have been engaged previously and had agreed to take the site forward as a 100% affordable scheme, albeit is also considered that they could take on the affordable units as part of a mixed tenure scheme.

In addition to Newydd, the site promoter has also received an offer from a private social housing provider who would be prepared to support the site as a mixed tenure scheme.

This position has not changed since the Preferred Strategy stage, and is considered that there is continued developer interest for the site. This is not considered to change at any point – not least given the discussions held between the owners of the site in questions and developers of interest.

Environmental and Physical Constraints

As set out at the Pre-Application Stage. the site underwent a Preliminary Ecological Appraisal in September 2022 which identified that whilst some precautionary measures were recommended in terms of protecting priority habitats and reptiles, the site is not fundamentally constrained from development on ecological terms. Given this, it is considered that further ecological surveys would be undertaken at the planning stage to inform any development proposals and ensure the safeguarding of the natural environment.

Access to Key Services (Retail, Primary Schools, and Health Services) and to Services and Facilities

As set out within the representations made to the Preferred Strategy, the site is located within a maximum of a 20-minute bus journey to a version of every key service listed, due to the proximity of the site to settlements such as Cowbridge, Culverhouse Cross and St Nicholas. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Bonvilston without the need to travel by car.

To reiterate, the site 'Land South of the A48, Bonvilston' is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Concluding this allocation as 'unsustainable' in regard to 'availability of local facilities in and around settlements' is not accurate. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

• Cowbridge Comprehensive School;
• St Nicholas Primary School;
• Cowbridge Health Centre; and
• Cowbridge town centre for various Retail Services.

It should also be noted that Bonvilston contains a number of facilities within a short and level walking distance of the site, including the village shop and Café, as well as the Red Lion Public House.

Given the accessibility of the site to other settlements, and the fact that these are made accessible by bus and active travel routes, it is considered that the site should be concluded as sustainable in regard to access to key services.

Summary and Conclusion

As evidenced above, and within the representations made to the Preferred Strategy (Appendix B), there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location, and site, are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025)

which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston.

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• “Time period of pre-application discussions/PAC consultation” = 4 months
• “Time between submission of planning application and determination” = 6 months
• “Time taken from planning consent to the discharge of relevant conditions to enable site construction” = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of “6 months” given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within “4 months” as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicated in the ‘Timing and Phasing of Sites’ table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large ‘spike’ (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren’t spread out more evenly throughout the Plan period - to ensure a robust and most realistic

housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document "New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the

Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.

Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable

transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the

suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

“A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth.”

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the ‘Rectory Field, St Brides Road’ site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

‘Land West of Maendy Road’ has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the ‘Candidate Assessment at Preferred Strategy Stage’ (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the “soundness” of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is “sound” (i.e. its allocation is considered to be “unsound”).

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of ‘Land to north and west of Westwinds Business Park’:

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above the site was not considered suitable for further consideration with the site scoring negatively (red) in a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in ‘Sustainable Transport – Public Transport’, this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states “New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes”. Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states “new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport.”

It is well known residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need “To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy”. To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to “Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure”. In addition, Promoting Active and Sustainable Travel Choices outlines to “Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel”.

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory “there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities”. There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A “small scale

affordable housing led development” which is needed to “respond to local affordable needs and help sustain services and facilities within these rural communities” will therefore not be provided for. This is clearly an issue.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above the site was rejected and considered not suitable for further consideration. In fact, and unlike ‘Land at Heol Fain, Wick’ and ‘Land to north and west of Westwinds Business Park’ it was stated that this site “could not be considered as a suitable affordable housing led development site”. Despite this, this site has been outlined as an Affordable Housing Led Allocation. As such, the inclusion of this site is “unsound”.

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Land South of A48, Bonvilston.

Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3jp
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3kr
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k3
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k6
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kf
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kh
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z5

7170 Object

Document Element: SP6 - HOUSING REQUIREMENT
Respondent: Wig Fach Property Company Ltd [2373]
Agent: Geraint John Planning Ltd

Summary:

We would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.
It considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ogmore By Sea area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken

from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either Key Settlement, Service Centre settlement or Primary Settlements, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Ogmore By Sea. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and

Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought

about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now

further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that the should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 124 affordable homes in the St Brides Major local housing market area (which Ogmore is located within). As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

It is questionable whether Wick has the capacity to accommodate 50 new dwellings, given the sustainability and rural nature of the area. As a result, it is suggested that the number of homes allocated in Wick is reduced and that a further allocation in St Brides Major is secured, in order to facilitate supporting the delivery of affordable housing through the housing market area, rather than in one minor rural settlement. The sustainability of Ogmore has been assessed, both by the Council through the Sustainability Appraisal and again, through our assessment of the site.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a

target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4 % of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.

Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ogmore and the proposed site. As outlined within these representations, it is considered that the site (ID xxx) represents a sustainable, deliverable and acceptable site. The site is within a maximum of a 22- minute bus journey to a every key service listed, due to the proximity of the site to settlements such as Bridgend. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Ogmore By Sea without the need to travel by car. The site is located within 5 miles of Bridgend, and within a maximum 22-minute bus journey of the following services:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre for various Retail Services

Moreover, Ogmore has benefitted from the recent development of the Ogmore By Sea Village Hall, which provides space for community activities and events to take place. The hall also includes a coffee shop (Welsh Coffee Company), which only adds further to the daily services provision available within the settlement. Access to the hall and coffee shop is directly provided for pedestrians from the Main Road, which allows for direct access from the site.

Accordingly, the settlement of Ogmore represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

It is acknowledged that the site also lies within the Glamorgan Heritage Coast and this point is addressed further below.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ogmore By Sea, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a ‘cap’ of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a ‘cap’ limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 “For the purposes of this policy, ‘small-scale’ will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area.”

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

Policy DNP3 – Glamorgan Heritage Coast

Given that the site is located in the Glamorgan Heritage Coast, it is noted that the following policy is of relevance to any future development on the site. Criteria 4 of Policy DNP3 states:

“The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development that accords with National Policy.”

It is also noted that supporting Para 6.422 "In seeking to protect the Glamorgan Heritage Coast, the Council acknowledges that there are some built up areas within the boundary, including the Minor Rural Settlement of Ogmore. In addition, the Vale of Glamorgan rail line crosses part of the Heritage Coast designation in the location where a new station at St Athan is proposed. Whilst being mindful of the need to protect the special qualities of the Glamorgan Heritage Coast, the Council accepts that development within these areas is appropriate, subject to relevant policies of the Plan"(GJP emphasis).

We would offer general support for this policy, and consider this to provide flexibility which allows for certain forms of development. However, we would suggest that the policy wording should be amended to reflect that 'housing' should be supported in the Glamorgan Heritage Coast, providing that the policy exceptions are met. Therefore, the following amendment is proposed as part of the policy should be changed to include "small scale housing" or something similar. The proposed amendments to Policy DNP3 are outlined below in red:

"The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development, including small-scale housing proposals that accords with National Policy."

Again, this would ensure that suitable housing developments can be delivered in the Plan period, to meet the housing needs of the Vale of Glamorgan – particularly in respect of affordable housing.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to Policy DNP3 – Glamorgan Heritage Coast, given the lack of recognition for the potential for small-scale housing proposals;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of

the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land at Hazelwood, Ogmore By Sea (Site ID: 3855) sets out that the position of the site at the Deposit Stage is as follows:

"The original site as ruled out as the development would represent unacceptable intrusion in to the open countryside. Whilst the site has now been identified for an affordable housing led development, the original reason for ruling it out still remains."
In terms of the assertion that "the development would represent an unacceptable intrusion into to the open countryside", this is strongly disputed, in that the development of the site would represent a natural rounding off of the existing settlement boundary. An extract of the site relative to the settlement boundary is provided below, which clearly shows that the development of the site would not extend beyond the existing settlement pattern that exists in Ogmore.

Site Outlined in Red and Settlement Shaded in Blue
As clearly demonstrated in the above mapping, the site would extend no further eastwards than the existing housing area to the south of the site. Equally, the site would not be extending any further north than the existing settlement pattern in Ogmore. This position is further supported by the wider aerial view of the site provided overleaf:

Wider Aerial View of Site Outlined in Red and Settlement Shaded in Blue

In summary, it is considered that the proposed allocation of the site represents a logical rounding off of the existing settlement, as depicted in the mapping provided above – where the site follows the existing envelope of the settlement. The site does not extend any further eastwards than the established built form located immediately to the south; indeed, it sits comfortably within the same development line.

As such, it cannot be considered that the site represents an 'intrusion' into the countryside, as the site would be visually and functionally related to the settlement. It therefore follows that the site would be read as part of the settlement, and not the wider rural landscape.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage
As demonstrated above, there are no changes to the scoring attributed to the site. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with this submission (see Appendix A).

Sustainability

Notwithstanding the above, it is considered that the site represents a more sustainable location than what was previously assessed at Preferred Strategy stage, in light of the Ogmore by Sea Hall development. The Hall acts as a community facility, whereby the space is available for hire by local community groups such as birthday parties, weddings, group meetings, and other such similar uses. Moreover, a café (Welsh Coffee Co) is located within the premises which sells both food and drink.

The hall and café are within walking distance to and from the site, where new access facilities have been implemented from Main Road directly to the building, to allow access for pedestrians and cyclists. This is illustrated in the image below:

Walking and Cycling Facilities

The Tusker Rock pub and post office are also located along Main Road, all of which are within walking distance to the site.

Accordingly, the site is well served by new amenities (i.e. community hall) that comprehensively improves the sustainability of the site / settlement, and in turn, improves the sustainability credentials of the site promotion. It

therefore follows that the site represents an acceptable location for residential development, and the site should be looked upon favourably accordingly.

It is also the case, as set out in previous representations, that the site is within a maximum 22-minuted bus journey of the following services and facilities:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre.

As such, key services and facilities can be access by sustainable travel over and above the existing level of provision available in Ogmore By Sea (as discussed above).

Accordingly, the relevant 'red' scorings in the Council's assessment should be updated to reflect the site's suitability and sustainability to accommodate the proposed residential development of the site.

Glamorgan Heritage Coast

Insofar as to the position regarding the site's location within the Glamorgan Heritage Coast, detailed submissions are made not only in the Preferred Strategy representations, but also in Annex 1 of this submission. In short, given the pressing need for such development (particularly affordable housing) to come forward in the Plan period to meet ever-increasing needs, development of this nature should be considered more favourably – not least that, as outlined in this Annex, the site would not extend any further that the existing settlement boundary.

Accordingly, the site would be perceived to form part of the settlement of Ogmore By Sea, and not the wider landscape, and therefore, would not have any detrimental impact on the Heritage Coast in any respect. The scoring should be amended accordingly to reflect this position.

Climate Change

As outlined in previous representations, the development will incorporate climate change measures, such as EV charging points, PV panels, as well as adopting sustainable materials for construction whilst maximising the potential for the dwellings to be energy efficient. Accordingly, the development will be built to high sustainable standards, and therefore, the scoring of the site should be amended as a result.

Summary and Conclusion

It has been evidenced above that there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;

9. Conclusions Procedural Consultation Matters
Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:
Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston;

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating “it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents”.

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 “A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information”. Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• “Time period of pre-application discussions/PAC consultation” = 4 months
• “Time between submission of planning application and determination” = 6 months
• “Time taken from planning consent to the discharge of relevant conditions to enable site construction” = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of “6 months” given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition

details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicated in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled

forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.

Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement

Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and

• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in

locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale

affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Hazelwood, Ogmore By Sea, the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below.

With reference to the above:

• In terms of public transport, there are two bus stops located approximately 200m (3-minute walk) from the site ('Ogmore By Sea Post Office'), with the '303' providing services between Llantwit Major and Bridgend.

• The site is located 200m (3-minute walk) from the 'Ogmore By Sea Post Office' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

• The site is also located 50m (1-minute walk) from a children's park.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities. This

Furthermore, the settlement of Ogmore By Sea has been ranked higher than Llangan (which the site 'Land to north and west of Westwinds Business Park' is located within) in the VoG Sustainable Settlements Appraisal, and therefore, is considered to constitute a more sustainable location to accommodate residential growth. Most notably, Ogmore By Sea scores '13' in respect to 'Daily Facilities' whereas Llangan only scores '3', evidencing that residents in Ogmore have much better access to services within the locality as compared to Llangan.

Given the above, 'Land at Hazelwood, Ogmore' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Hazelwood, Ogmore' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help

sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as

an Affordable Housing Led Allocation. As such, the inclusion of this site is “unsound”.

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it’s consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3zt
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3z4
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z6
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3z8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zv
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zc
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zw

5103 Object

Document Element: HG1 - HOUSING ALLOCATIONS
Respondent: Mr Hector Townsend [3127]

Summary:
All the sites too much traffic no room in school or doctors

Full text:
All the sites too much traffic no room in school or doctors

Change suggested by respondent:
-

Sound: Not specified
Attachments:
Paper Representation Redacted - https://valeofglamorgan.oc2.uk/a/4rd

5105 Object

Document Element: HG1 - HOUSING ALLOCATIONS
Respondent: Mrs K Mason [3129]

Summary:
I'm objecting to all the site, as too much traffic it's awful as it is now, it will be impossible to move on the roads. Schools full, Doctors full, Roads already in a mess. A big NO

Full text:
I'm objecting to all the site, as too much traffic it's awful as it is now, it will be impossible to move on the roads. Schools full, Doctors full, Roads already in a mess. A big NO

Change suggested by respondent:
-

Sound: Not specified
Attachments:
Paper representation redacted - https://valeofglamorgan.oc2.uk/a/snk

5302 Object

Document Element: HG1 - HOUSING ALLOCATIONS
Respondent: Mr Huw Allaway [2434]

Summary:
There are far too many sites/houses being proposed. Without ensuring road network, medical services, transport, schools are improved it is a recipe for disaster and gridlock

Full text:
There are far too many sites/houses being proposed. Without ensuring road network, medical services, transport, schools are improved it is a recipe for disaster and gridlock

Change suggested by respondent:
A plan should have Partnership working with Health, Transport for Wales, Bus Companies at it's core rather than just saying it isn't our responsibility.

Sound: No
Attachments: None

5429 Object

Document Element: HG1 - HOUSING ALLOCATIONS

Respondent: Mrs Susan Evans [712]

Summary:

Ks3 KS4 and KS5 and in primary settlements which does not fit with the previous statement ps that they will be focused on key settlement or primary service settlemnts.

Full text:

Ks3 KS4 and KS5 and in primary settlements which does not fit with the previous statement ps that they will be focused on key settlement or primary service settlemnts.

Change suggested by respondent:

Remove any allocated sites outside of key or primary service settlements

Sound: No

Attachments: None

5454 Object

Document Element: HG1 - HOUSING ALLOCATIONS

Respondent: Ms Ann Barnaby [1702]

Summary:

I believe this LDP is unsound as it appears to have just placed major developments of houses were land was put forward without and sustainable forward thinking 'plan'. In particular St Athan is going to be significantly impacted, the growth in this Vale 'Village' means it is already larger than Cowbridge Town, without the transport links and facilities. There is no guarantee people will choose to live and work close by if jobs did materialise. Therefore the impact of 2 + cars per additional house should be considered at Barry as well as the close by junctions.

Full text:

I believe this LDP is unsound as it appears to have just placed major developments of houses were land was put forward without and sustainable forward thinking 'plan'. In particular St Athan is going to be significantly impacted, the growth in this Vale 'Village' means it is already larger than Cowbridge Town, without the transport links and facilities. There is no guarantee people will choose to live and work close by if jobs did materialise. Therefore the impact of 2 + cars per additional house should be considered at Barry as well as the close by junctions.

Change suggested by respondent:

Review of the overall allocation of houses, for actual need, location and infrastructure should be made. The train station at St Athan even if delivered will not stop cars as the time to Cardiff on train is too long! Green space and peoples wellbeing must be considered on any designs and planning! Planning is the process of thinking regarding the activities required to achieve a desired goal. Planning is based on foresight, the fundamental capacity for mental time travel. Some researchers regard the evolution of forethought - the capacity to think ahead! Not just fill up a green field with houses today - think for tomorrow! I do not see this forethought in the development plan.

Sound: No

Attachments: None

5462 Object

Document Element: HG1 - HOUSING ALLOCATIONS

Respondent: Mr David Entwistle [3264]

Summary:

The proposed locations of the vast majority of new developments do not align with reducing the need to travel. Many locations are served by inadequete infrastructure and public transport links. Many of the proposed locations are not served by sufficient access to a major supermarket, healthcare facility or school. Likewise public transport is not adequate already in the locations proposed. One train per hour, one bus per hour, 100 parking spaces or less at train stations will not provide the opportunity for people to switch to transport modes other than private vehicles.

Full text:

The proposed locations of the vast majority of new developments do not align with reducing the need to travel. Many locations are served by inadequete infrastructure and public transport links. Many of the proposed locations are not served by sufficient access to a major supermarket, healthcare facility or school. Likewise public transport is not adequate already in the locations proposed. One train per hour, one bus per hour, 100 parking spaces or less at train stations will not provide the opportunity for people to switch to transport modes other than private vehicles.

Change suggested by respondent:

The proposed locations do not align with the stated policy. The locations need to be either reconsidered with more importance placed on access to infrastructure, facilities and public transport or ideally the infrastructure and public transport in the Vale needs to be considerably improved before further development and major population growth occurs.

Sound: No

Attachments: None

5465 Object

Document Element: HG1 - HOUSING ALLOCATIONS

Respondent: Mr David Entwistle [3264]

Summary:

The locations proposed are not well served by rail or bus services. One train per hour in the case of locations outside Barry, approx 100 parking spaces or less at train stations and one bus or none per hour in many locations are not adequate to persuade people to change their main mode of transport from private vehicles.

Full text:

The locations proposed are not well served by rail or bus services. One train per hour in the case of locations outside Barry, approx 100 parking spaces or less at train stations and one bus or none per hour in many locations are not adequate to persuade people to change their main mode of transport from private vehicles.

Change suggested by respondent:

Prior to any housing developments being approved the council should ensure public transport is sufficient in advance of planned population growth. Train frequencies outside of Barry need to increase substantially. Likewise bus frequencies need to increase substantially and bus routes need to be expanded. Parking at train stations also needs to be expanded. At present even if I wanted to travel into Cardiff from my home in Barry by public transport for example it is impractical and this is why the service is under utilised. Public transport improvements need to come before new development and population growth and show a sustained reliable period of operation with excess capacity before developments are approved.

Sound: No

Attachments: None

5648 Object

Document Element: HG1 - HOUSING ALLOCATIONS
Respondent: Mr David Entwistle [3264]

Summary:
The healthcare facilities in many areas of the Vale are already limited with unacceptable travel distances required to facilities and unacceptable wait times. Increased road congestion from new developments in badly situated sites will also increase air quality problems leading to further declines in resident health.

Full text:
The healthcare facilities in many areas of the Vale are already limited with unacceptable travel distances required to facilities and unacceptable wait times. Increased road congestion from new developments in badly situated sites will also increase air quality problems leading to further declines in resident health.

Change suggested by respondent:
The sites proposed for many new developments such as North West Barry are badly planned. New sites should be proposed closer to existing healthcare facilities and in areas liable to cause less reliance on private vehicles and associated decreases in air quality. New healthcare capacity should be provided well in advance of new developments entering the LDP.

Sound: No
Attachments: None

5817 Object

Document Element: HG1 - HOUSING ALLOCATIONS
Respondent: Mr William Hart [1009]

Summary:
Development of countryside along main road margins is preferable to making towns even larger.

Full text:
Deveopment of countryside along main road margins is preferable to making towns even larger.

Change suggested by respondent:
Allocate areas along road margins for development in preference to enlarging towns.

Sound: No
Attachments: None

5943 Comment

Document Element: HG1 - HOUSING ALLOCATIONS
Respondent: National Grid Electricity Transmission [434]
Agent: Lucy White Planning Limited

Summary:
NGED owns and is responsible for electrical distribution apparatus within the area subject to this Local Plan and is the licensed network operator with statutory duties and powers including compulsory purchase powers.

In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of National Grid's infrastructure to enable NGED to supply electricity in the most efficient and cost-effective manner. In the majority of cases this will involve retention of the existing infrastructure in situ, including overhead power lines and pylons.

Advice is given on allocating land affected by high voltage power lines and the steps required for connection to the distribution network.

NGED has no site specific comments on the proposed allocations within the Deposit Draft Plan.

Full text:
These representations are prepared on behalf of National Grid Electricity Distribution Plc (NGED) (formerly Western Power Distribution Plc), in response to the Vale of Glamorgan Local Development Plan Deposit Draft, which is subject to public consultation.
Introduction
NGED owns and is responsible for electrical distribution apparatus within the area subject to this Local Plan and is the licensed network operator with statutory duties and powers including compulsory purchase powers.
In preparing development plans, local planning authorities (LPA) have a duty to safeguard the operation of National Grid's infrastructure to enable NGED to supply electricity in the most efficient and cost-effective manner. In the majority of cases this will involve retention of the existing

infrastructure in situ, including overhead power lines and pylons.
Towards Net Zero
The Government is committed to achieve net zero by 2050. The shift towards electricity to heat our homes and power our cars is critical to achieving this goal and the National Grid is playing a crucial role in meeting this commitment by increasing capacity to meet the growing demand for electricity. Our network investment planning process is the strategic approach we are taking to investing in our network, ensuring that it can meet future demand in the right place, at the right time while ensuring good value for money for customers.

To ensure that we can provide the network you need from us, your projects need to be included in our Distribution Future Energy Scenarios (DFES). We use this information to predict the future requirements on our network and decide when and where to invest in the network. This ensures that our strategic network planning provides sufficient network capacity as the country transitions to net zero.
We ask Local Authorities about their future plans, including information in your Local Plan annually (normally in May - July). This will inform our future forecasts down to Electricity Supply Area level ensuring we can connect new developments in 5 years and beyond.
NGED strongly recommends that local planning authorities feed into the DFES process on an annual basis, to ensure they have your most current growth plans and ambitions.

The DFES informs planning of the network beyond 3 to 5 years into the future (post 2030). If you have a development that needs a connection sooner, please contact NGED as soon as possible to have a discussion with them about securing a connection. A ‘connections surgery’ can be arranged to discuss any developments you would like to connect.
NGED cannot guarantee capacity until a formal connection offer has been requested, issued and accepted.

132kV Overhead Lines
Where diversion and/or undergrounding of overhead lines is deemed necessary to enable the development of a proposed allocation, lower voltage lines (up to 33kV) supported by wooden poles can normally be undergrounded or diverted without significant concern. However, where land allocations affect lines supported by steel lattice towers, particularly 132kV, the LPA are advised to engage with NGED at the earliest opportunity in the plan-making process to confirm:
a) whether the lines can be accommodated within the development site; or
b) the viability and feasibility of diverting and/or undergrounding overhead lines.
This includes, where relevant, ensuring the agreement of third party landowners to the provision of new infrastructure on their land and subsequent agreement between the LPA and NGED to appropriate wording within the allocation policy.
In allocating land affected by high voltage power lines, the LPA should take into account the additional costs involved in their diversion and/or undergrounding, the need for additional new infrastructure and its visual impact, including larger terminal towers at either end of an undergrounded line, and the potential impact on timescales for delivery of the development.

LPAs should also be aware that where high voltage electricity lines are undergrounded National Grid is unable to support any development which could affect the operation of or obstruct the line, including buildings, tree planting, public highway or attenuation features. A 10m wide corridor of open ground is required above the undergrounded cables. Accordingly, the retention of overhead lines in situ provides greater opportunities to deliver an efficient and effective masterplan, with the potential to deliver a range of uses beneath the lines including green infrastructure, public highway, drainage features and some biodiversity net gain measures.
NGED cannot be held accountable for the absence of a planned solution for a proposed diversion route or undergrounding of an overhead power line or any subsequent reduction in the allocation site’s development capacity, where the LPA and/or developer/landowner has not agreed proposals with NGED prior to the adoption of the Local Plan.
Planning for reinforcement
Reinforcement planning is crucial for future growth. As NGED's Network Development Plans identify the need for new substations and other assets to meet future electricity demands, LPAs should collaborate with NGED on suitable locations. Land for these substations should be safeguarded through the Local Plan, with substation delivery timescales factoring into the LPA's housing trajectory.
NGED cannot comment on network capacity for developments beyond five years. To ensure future capacity, LPAs must engage in the Distributed Future Energy Scenarios (DFES) process and review Network Development Plans to confirm their projected growth is included in NGED's plans.
Summary
NGED does not object to the allocation of land upon which its infrastructure is present, however, in the context of the Government’s commitment to reach Net Zero by 2050 and the role which National Grid has to play in delivering significant new infrastructure to meet existing and future energy demands, all reasonable efforts should be made by LPAs and developers to safeguard to retain the existing grid infrastructure and the associated embodied carbon.

In preparing Local Plans, LPAs should take the following steps:
1. Ensure your LPA is responding annually to our Distribution Future Energy Scenario questionnaire that is sent out via Regen.
2. For developments that require a connection to the distribution network within the next 5 years, contact NGED as early as possible to arrange a Connections Surgery. The surgery will help you understand the timescales and costs associated with delivering the planned development. .
3. Where land is allocated, priority should be given to retention of high voltage overhead lines wherever possible, with design principles included within the allocation policy to safeguard the retained lines and incorporate sensitively into the development, whilst achieving high standards of design and an efficient use of land.
4. Where necessary, early engagement with NGED to establish whether its infrastructure can be accommodated within the development or whether diversion/undergrounding is feasible;
5. Where diversion/undergrounding is required, ongoing dialogue with NGED to agree a potential route prior to adoption of the Local Plan, as outlined above.
6. For strategic allocations and sites significantly affected by overhead lines (e.g. with 5 or more pylons on site), NGED recommends early masterplanning and the preparation of Supplementary Planning Documents to demonstrate site capacity and establish principles for the retention/diversion or undergrounding of overhead lines and safeguarding of land to accommodate new sub-stations, where necessary, with the agreement of NGED.
NGED has no site specific comments on the proposed allocations within the Deposit Draft Plan.
I trust this is useful in the preparation of the Local Plan. Should Officers have any queries regarding the above, please do not hesitate to contact me.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3xy

5953 Comment

Document Element: HG1 - HOUSING ALLOCATIONS

Respondent: Mr Richard Cobourne [3440]

Summary:

Housing — land to the south of Millands Farm etc.
HG1(5), HG2(21) and HG2(3)

I am silent on this proposal

Full text:

Housing — land to the south of Millands Farm etc.
HG1(5), HG2(21) and HG2(3)

I am silent on this proposal

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6069 Object

Document Element: HG1 - HOUSING ALLOCATIONS

Respondent: Barratt Redrow Homes [2669]

Agent: Lichfields

Summary:

Cowbridge, as a Service Centre Settlement, is underrepresented in housing allocations in Policy HG1, with only 105 units allocated and no major land bank sites. As such, the housing allocations in Policy HG1 do not align with Cowbridge's ranking as a Tier 2 settlement in Policy SP2. This under-provision limits Cowbridge's ability to meet housing needs, especially affordable housing, despite its importance within the hierarchy. An additional site at Land at Primrose Hill, capable of up to 220 dwellings, could help address this gap and support the RLDP's growth strategy.

Full text:

The Service Centre Settlement of Cowbridge comprises a sustainable self-contained settlement with regards to access to services such as primary and secondary schools, shops including supermarkets, medical services at the GP surgery and pharmacy, sports activities including a leisure centre, a library and places of worship. Cowbridge has excellent connections to the A48 with regular bus services providing access to Cardiff, Porthcawl and Llantwit Major.

The Service Centre Settlements are the middle-tier in Policy SP2 and as well as Cowbridge, include Llantwit Major and Penarth. The Key Settlement of Barry being the top-tier and the Primary Settlements of Rhoose, St Athan, Sully, Llandough (Penarth) and Dinas Powys being categorised as the lower-tier, below Cowbridge.

Policy HG1 sets out the housing allocations to meet the identified housing requirement set out in Policy SP6. HG1 allocates sites for a total of 3,398 dwellings across Key Sites and Housing Allocations. Of the 3,398 units:

• Key Settlement (tier 1) = 686 (20.2%)

• Service Centres (tier 2) = 340 (10%)

• Primary Settlements (tier 3) = 2,372 (69.8%)

It is clear that the allocations in Policy HG1 do not reflect the proposed settlement hierarchy with an under representation of allocations in the second tier Service Centre Settlements. There are only two allocations in Service Centre Settlements: HG1(5) at Llantwit Major for 235 units and HG1(6) at Cowbridge for 105 units.

A review by settlement further highlights the under provision of allocations and major land bank sites at Cowbridge compared to other higher order settlements:

Tier 1 Barry – 686

Tier 2 Cowbridge – 105
Llantwit Major – 475
Penarth – 576

Tier 3 Rhoose – 859
St Athan – 1,263
Sully – 175
Llandough – 133
Dinas Powys – 250

It is evident that there are fewer allocations made to Cowbridge than any other higher order settlement and significantly less than many of the tier 3 settlements. A review of the Housing Land Supply document BP9A highlights that there is only planning permission for 203 dwellings in Cowbridge that were not started as of April 2025. The case cannot be made that there is an existing unimplemented land bank to meet the needs of this settlement.

Furthermore, Paragraph 3.5 of the Local Housing Market Assessment (2023) sets out that “The 2021 LHMA indicated that the existing backlog of need is most acute from people on the housing waiting list within Barry, Penarth/Llandough, Llantwit Major, Cowbridge, Dinas Powys, Rhoose, Wenvoe and St Athan although there are a significant number of people on the waiting list across all areas of the Vale.”

Having only one allocation, and no major land bank sites at Cowbridge does not reflect the importance of Cowbridge as a Service Centre Settlement. The failure to make significant new allocations in this Tier 2 settlement undermines the ability of this important settlement to meet its housing needs including affordable needs.

Policy HG1 apportions only 105 dwellings (or only 1.3% of the housing requirement as set out in Policy SP1) to one of only three second tier settlements. Thus, the number of units allocated to Cowbridge does not align with the Settlement Hierarchy presented in Policy SP2. As explained in our representations to Policy SP1 and SP6 above, a more ambitious housing requirement is needed in the VoG.

It is therefore evident that in order for the RLDP to meet the third test of soundness (Will the Plan deliver?), Cowbridge needs additional housing allocations to ensure that housing is delivered at a scale commensurate to the settlement hierarchy in Policy SP2 and to achieve the RLDP Growth Strategy which commits to housing growth that accords with the Vale’s position within the Cardiff Capital Region.

Land at Primrose Hill (with a capacity of up to 220 dwellings) is available, with limited physical and environmental constraints, to assist with the much-needed increased delivery of housing at Cowbridge during this RLDP period.

Change suggested by respondent:

We therefore request that Land at Primrose Hill (Candidate Site ID: 455) is allocated for housing development in Policy HG1. The site is located in one of the most sustainable settlements in the settlement hierarchy, Cowbridge, which is also at the top of the retail, commercial and service centre hierarchy in Policy SP11. Cowbridge has a serious lack of allocated land for housing development and major land bank sites in the RLDP as drafted.

In order for Cowbridge to match its status in the hierarchies of Policy SP2 and SP11, the RLDP needs to include Land at Primrose Hill for allocation would deliver up to 220 homes during the RLDP period. Land at Primrose Hill is within easy reach of the town centre and in close proximity to excellent commercial, educational, community and recreational facilities and services. The site is well positioned to be accessed via the local highway network, which links to both Cardiff, Penarth and Bridgend via regular bus services from bus stops adjacent to the site.

Sound: No

Attachments: None

6378 Comment

Document Element: HG1 - HOUSING ALLOCATIONS

Respondent: Mrs Jaqueline Hughes [3563]

Summary:

Housing - Land to the South of Millands Farm [Site ID 352 Proposal Number HG1 (5)], Land between the Northern Access Road and Eglwys Brewis Road [Site A Proposal Number H2 (2)] and Land between the Northern Access Road and Eglwys Brewis Road [Site B Proposal Number H2 (3)]
Although the proposed sites for housing will not fall within the Llanmaes boundary, I must make comment on my serious concerns regarding the apparent lack of provision of infrastructure for these developments. Where is the new Health Centre, additional Primary and Secondary schools (extending St Athan Primary would not be adequate for children from potentially 600 households), Sport and Leisure facilities? These essential, basic requirements cannot be met by existing, already stretched services in Llantwit Major alone

Full text:

Housing - Land to the South of Millands Farm [Site ID 352 Proposal Number HG1 (5)], Land between the Northern Access Road and Eglwys Brewis Road [Site A Proposal Number H2 (2)] and Land between the Northern Access Road and Eglwys Brewis Road [Site B Proposal Number H2 (3)]
Although the proposed sites for housing will not fall within the Llanmaes boundary, I must make comment on my serious concerns regarding the apparent lack of provision of infrastructure for these developments. Where is the new Health Centre, additional Primary and Secondary schools (extending St Athan Primary would not be adequate for children from potentially 600 households), Sport and Leisure facilities? These essential, basic requirements cannot be met by existing, already stretched services in Llantwit Major alone

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3qz

6502 Comment

Document Element: HG1 - HOUSING ALLOCATIONS

Respondent: Vicky Jewell [3610]

Summary:

The term "unit" is undefined in the documents. Does it refer to an entire block of flats/apartments or a single flat within a block? Clarification is needed on the number of units/blocks and flats/apartments per block planned for the Weycock Cross, Barry and other sites.

Full text:

I oppose the Vale of Glamorgan Council Replacement Local Redevelopment Plan (RLDP), in particular the Weycock Cross, Barry development for the following reasons:

1. The consultation form and accompanying literature/reports is excessively lengthy, making it difficult for many individuals, especially those with health challenges and older adults, to engage effectively. This renders the consultation process inequitable.
2. While I agree that personal details of those commenting should be shared with relevant Council members, these should not be made public, I question the legality of this. The current policy discourages participation due to fears of backlash, undermining fairness.
3. Neither I nor several other residents were informed about the public consultation event at Barry Memo Arts Centre on Monday, 2nd February, which is unfair.
4. The term "unit" is undefined in the documents. Does it refer to an entire block of flats/apartments or a single flat within a block? Clarification is needed on the number of units/blocks and flats/apartments per block planned for the Weycock Cross, Barry and other sites.
5. The RLDP specifies a minimum of 30% affordable housing for the proposed Weycock Cross, Barry site which is substantial. However, the maximum percentage is not stated. What is the proposed maximum amount?
6. How much of the affordable housing will be acquired by the council or private entities and converted into social housing?
7. Regarding social housing occupancy - with VOG Council being a "county of sanctuary" and the Government's "Operation Scatter" initiative, how many individuals with illegal or uncertain immigration status or with indefinite leave to remain, will reside in Weycock Cross, Barry? This could significantly impact the area's culture.
8. How many Houses of Multiple Occupancy (HMOs) will be established at Weycock Cross, Barry? What is the maximum number of occupants per HMO? This also relates back to point 7.
9. Traffic congestion is already a significant issue around Weycock Cross, Barry. Additional housing developments at Weycock Cross, Barry and surrounding areas (e.g. Rhoose, Llantwit Major, St Athan, etc.) will exacerbate this, increasing air pollution and affecting access to Cardiff Airport and access for emergency services.
10. Flooding is a serious concern. Areas like Porthkerry Park and the Millwood already experience significant flooding, which development at Weycock Cross would worsen, to potentially catastrophic levels.
11. Illegal sewage dumping is likely to increase with new developments, compounding environmental and health issues.
12. The loss of green spaces and wildlife habitats is troubling, especially given the ongoing ash dieback affecting Porthkerry Park and surrounding areas. Traffic has also resulted in otter fatalities.
13. According to the Council's report, there are insufficient primary school places to accommodate new housing developments.
14. Health and well-being facilities, such as GP surgeries, are inadequate to support additional residents, as noted in the Council's report.
15. Public transport is insufficient. The nearest train station, Barry, is a considerable distance away and requires an uphill walk. Bus services are infrequent, making car travel necessary. Walking to and from the town center is impractical.
16. Concerns exist regarding the use of Persimmon for this development, given past issues with fire regulation compliance at the White Farm, Barry development and legal action required to enforce infrastructure commitments at both the White Farm and the Barry Waterfront developments. What guarantees will the Council put in place to ensure this won't be repeated?

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/tyz

6509 Object

Document Element: HG1 - HOUSING ALLOCATIONS

Respondent: Vale of Glamorgan Council Conservative Group [3614]

Agent: Councillor George Carroll

Summary:

Our Group does not consider any of the key sites designated within the Plan to be suitable. The respective ward members for St Athan, Rhoose, Illtyd and Dinas Powys have articulated detailed reasons for this previously.

Full text:

I write regarding the ongoing consultation relating to the Deposit Plan. I make these representations in my capacity as Leader of the Council's Conservative Group. Please take this correspondence as our Group's response to the consultation.

Our Group does not consider any of the key sites designated within the Plan to be suitable. The respective ward members for St Athan, Rhoose, Illtyd and Dinas Powys have articulated detailed reasons for this previously. I too, as ward member for Llandough, have raised concerns regarding the impacts developing the Cardiff Road site would have on road safety issues at the Merrie Harrier junction.

Our Group has been approached by residents from across the Vale of Glamorgan expressing deep concerns regarding the consultation process. Many have found the consultation portal difficult to navigate, and relevant information hard to locate. Given the time required to read all the relevant documents prior to crafting a response, residents do not feel the six-week consultation process is sufficient. As a Group, we agree. For this reason, at Full Council on Monday, I requested extension to the consultation period. It is regrettable this was not granted.

As such, it is the view of our Group that the consultation is flawed. We therefore believe that it must be carried out again.

Thank you for taking the time to consider our representations.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/tps

6533 Comment

Document Element: HG1 - HOUSING ALLOCATIONS
Respondent: Barry & Vale Friends of the Earth [708]
Agent: Barry & Vale Friends of the Earth

Summary:

- Essential that viability information is provided for all Candidate Sites
- We do not find this reuirement has been met for All sites
- 3.44 PPW sets out the policy …housing delivery in the development plan process. A key element of this is ensuring financial viability is assessed at the candidate site stage. The site promoter (LPA, land owner and/or developer) must carry out an initial site viability assessment and provide evidence that sites can be delivered. As required by national policy, all candidate sites are subject to a viability assessment.

Full text:

- Essential that viability information is provided for all Candidate Sites
- We do not find this reuirement has been met for All sites
- 3.44 PPW sets out the policy …housing delivery in the development plan process. A key element of this is ensuring financial viability is assessed at the candidate site stage. The site promoter (LPA, land owner and/or developer) must carry out an initial site viability assessment and provide evidence that sites can be delivered. As required by national policy, all candidate sites are subject to a viability assessment.

- Strategic Growth Area: Focuses on settlements with good transport links to reduce car dependency.

You say this but Rhoose to St Athan fail it
- Rhoose: Key site for 339 homes north of the railway and employment development, including land east of Cardiff Airport (16.3 ha) and south of Port Road (44.75 ha).
- St Athan & Llantwit Major: Targeted for residential development, including 235 units near Eglwys Brewis Road and 105 units at St Athan Road., Clive Rd 51, Church Farm 500, west of St Athan 600
-
- Can't be called "good transport" without the railway – more frequent than hourly and with stations at Eglwys Brewis and St Athan. The 304 bus taking over an hour to Cardiff isn't "good". road transport is caught in snarl-ups at Weycock Cross and Culverhouse Cross.
- Single access key sites and others over 100 homes are not deliverable

Change suggested by respondent:

-

Sound: Not specified
Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/38m

6534 Object

Document Element: HG1 - HOUSING ALLOCATIONS
Respondent: MS Andrew R T Davies [1324]

Summary:

I strongly feel that all the key sites stipulated are unsuitable and inappropriate.

Full text:

I am writing to object to the Vale of Glamorgan Council's Replacement Local Development Plan.

I strongly feel that all the key sites stipulated are unsuitable and inappropriate. The entire strategy behind the deposit plan is flawed and the process needs to begin again.

I also express deep concern that the public have been unable to easily access material owing to the ways it has been published. The average person has not been able to adequately consider all of the information within the consultation period. As such the public need more time to produce their consultation responses and at the very least, the consultation period must be extended.

Change suggested by respondent:

-

Sound: Not specified
Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3yf

6582 Comment

Document Element: HG1 - HOUSING ALLOCATIONS

Respondent: Councillor Stephen Haines [1029]

Summary:

Scale of Housing Growth in St. Athan
The RLDP allocates: KS4 - 532 dwellings, KS5 - 600 dwellings, HG1(7) - 80 dwellings, HG1(8) - 51 dwellings.
This equates to 1,263 dwellings in St. Athan.
This represents a very significant expansion of the settlement and must be assessed against:
- Existing infrastructure capacity
- Transport provision
- Education and healthcare availability
- Retail and service provision
At present, St. Athan does not have a rail station and relies heavily on private car travel.
The Plan must demonstrate clearly that this level of growth is proportionate and deliverable.
Individually, smaller sites may appear acceptable. However, cumulatively they produce substantial growth in a settlement with constrained infrastructure.
The Plan must demonstrate:
- Why these sites were preferred over alternatives.
- That lower growth options were robustly assessed.
- That greenfield loss is justified and mitigated.

Full text:

1. Section of Plan to which this Representation Relates
- Sustainable Growth Strategy
- Key Housing Sites:
KS4 - Land at Church Farm, St. Athan (532 dwellings) KS5 - Land to the West of St. Athan (600 dwellings)
- Housing Allocations: HG1(7)
Former Stadium Site, adjacent to Burley Place (80 dwellings)
HG1(8) - Clive Road, St. Athan (51 dwellings)
- Transport Policy (TR)
- Community Infrastructure Policy (CI)
- Policy SP13 - Infrastructure Provision
- Green Infrastructure Policies

2. Summary of Representation
This representation raises concerns regarding:
1. The scale of housing growth in St. Athan.
2. The absence of guaranteed sustainable transport infrastructure.
3. Insufficient retail and community infrastructure provision, particularly within the ward of Flemingston.
4. The allocation of the Clive Road site (HG1(8)), which currently functions as a de facto village green.
5. The cumulative infrastructure impact of candidate and legacy site allocations.
The representation seeks modifications to ensure the Plan is infrastructure-led, deliverable, and compliant with national planning policy and the Well-being of Future Generations (Wales) Act 2015.

3. Scale of Housing Growth in St. Athan
The RLDP allocates:
- KS4 - 532 dwellings
- KS5 - 600 dwellings
- HG1(7) - 80 dwellings
- HG1(8) - 51 dwellings
This equates to 1,263 dwellings in St. Athan.
This represents a very significant expansion of the settlement and must be assessed against:
- Existing infrastructure capacity
- Transport provision
- Education and healthcare availability
- Retail and service provision
At present, St. Athan does not have a rail station and relies heavily on private car travel.
The Plan must demonstrate clearly that this level of growth is proportionate and deliverable.

4. Transport Infrastructure and Deliverability
The RLDP safeguards land for a "transport interchange" at St. Athan. However:
- There is no confirmed rail station.
- There is no confirmed funding package.
- There is no defined delivery programme.
- There are no binding occupation triggers linking housing delivery to transport delivery.

Previous references in planning documents referred to a railway station. The revised terminology of "transport interchange" reflects uncertainty.

Under Future Wales - The National Plan 2040, growth within the South East National Growth Area should align with

sustainable transport infrastructure. Without guaranteed rail provision, development risks being car-dependent and inconsistent with decarbonisation objectives.

This raises concerns under the soundness test: Will the plan deliver?

5. Retail and Local Service Provision - Flemingston Ward

The Deposit RLDP does not allocate new retail units or local service provision within the ward of Flemingston.
Given the scale of proposed housing growth across St. Athan and its surrounding areas, there is:

- No corresponding neighbourhood retail allocation.
- No clear commitment to small-scale convenience retail within walking distance of new development.
- No spatial recognition of Flemingston's service deficit.

This is inconsistent with Planning Policy Wales placemaking principles, which require:

- Mixed-use neighbourhoods.
- Walkable access to daily services.
- Reduced reliance on private vehicles.

Without provision of much-needed retail units within Flemingston ward, residents will remain dependent on car travel for everyday needs.
Modification is therefore sought to require neighbourhood retail and service provision proportionate to housing growth.

6. Clive Road Site (HG1(8)) - Community Function

The Clive Road site (HG1(8), 51 dwellings) currently functions as a de facto village green.
Although not formally designated, it is:
- Used informally for recreation.
- A visual open space within the settlement.
- A valued community amenity.
Its allocation for housing would result in:
- Loss of accessible informal open space.
- Erosion of community character.
- Reduction in green infrastructure connectivity.
The Plan should:
- Reassess the allocation in light of its community use; or
- Require equivalent or superior replacement open space within immediate proximity prior to development.
This matter engages Policy on Open Space and Green Infrastructure and must be considered in accordance with the prevention and long-term principles of the Well- being Act.

7. Candidate and Legacy Sites - Cumulative Impact Several allocations in St. Athan arise from:
- The Candidate Site process.
- Rolled-forward legacy allocations.
Individually, smaller sites may appear acceptable. However, cumulatively they produce substantial growth in a settlement with constrained infrastructure.
The Plan must demonstrate:
- Why these sites were preferred over alternatives.
- That lower growth options were robustly assessed.
- That greenfield loss is justified and mitigated.

8. Infrastructure and Phasing Concerns
Policy SP13 refers to securing infrastructure through planning obligations. However, reliance on financial contributions alone does not ensure timely delivery.

There is insufficient clarity regarding:
- Education capacity expansion.
- Primary healthcare provision.
- Highway mitigation triggers.
- Public transport enhancement sequencing.

Infrastructure must be delivered ahead of, or in tandem with, housing occupation - not retrospectively.

9. Compliance with the Five Ways of Working

Long-Term: Irreversible greenfield expansion without secured sustainable transport risks embedding long-term car dependency.
Prevention: Without infrastructure-first sequencing, congestion and service strain are foreseeable.

Integration: Housing growth appears to run ahead of confirmed transport and retail provision.
Collaboration: The Plan should demonstrate binding commitments from transport and infrastructure partners.
Involvement: Community concerns regarding scale and open space loss must be properly addressed.

10. Modifications Sought

To ensure soundness and compliance with national policy, the following modifications are requested:

1. Phasing Policy for KS4 and KS5
Introduce clear occupation thresholds tied to delivery of:
- Transport interchange infrastructure.
- Highway mitigation.Education capacity.
- Healthcare provision.

2. Retail Provision Requirement
Require neighbourhood retail and service provision within the ward of Flemingston proportionate to allocated and previous housing growth.

3. Clive Road Site Review (HG1(8))
Either:
- Remove the allocation; or
- Require replacement open space of equal or greater quality delivered prior to development.

4. Strengthened Infrastructure-First Wording
Amend Policy SP13 to make infrastructure delivery a pre-condition, not solely a contribution mechanism.

5. Monitoring Framework Enhancement Include specific indicators for:
- Sustainable transport modal share.
- Retail provision delivery.
- Open space replacement.
- Infrastructure phasing compliance.

11. Conclusion

St. Athan has a role within the wider Cardiff Capital Region and the South East National Growth Area. However, the current scale of housing allocation is not sufficiently matched by guaranteed infrastructure, retail provision, or community space protection.

Without modification, the Plan risks:
- Car-dependent growth,
- Loss of valued open space,
- Insufficient local retail provision,
- Pressure on community infrastructure.
This representation therefore seeks amendments to ensure that growth in St. Athan and Flemingston is proportionate, infrastructure-led, environmentally responsible, and compliant with Welsh planning policy.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3tk

6719 Comment

Document Element: HG1 - HOUSING ALLOCATIONS

Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference “enhancements to leisure, sport and recreation spaces”. Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation.

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning
guidance (SPG) proposed. We are keen to ensure that these SPG’s are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are

involved in the development of some of these. The content and application of the SPG's will be fundamental to the effectiveness of several of the policies identified in the
deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community
amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient
communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: "The Local Development Plan will support resilient and sustainable
local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part
of sustainable growth."

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local
diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

"Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other
opportunities for local food production as part of multifunctional green infrastructure."

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their
proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative
impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

6.54 We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live
full, productive and prosperous lives.'

6.60 We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid
HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to
ensure Developers submit a quality HIA and implement the conclusions.

6.61 Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

6.62 Wales Health Impact Assessment Support Unit has recently released guidance on HIA - see https://phwwhocc.co.uk/whiasu/ for more information and toolkits to ensure most up to date is in use.

6.63 Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the

RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the community..'.

6.65 Suggestion to change wording from 'encouraged' to 'expected' for example:
Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement
for HIA will assist with this expectation.

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference “enhancements to leisure, sport and recreation spaces”. Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation. It is recommended that the Key Site schedules include minimum on-site provision standards and delivery
phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population
growth.

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail
centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer
supply chains. This limits opportunities for strengthening local food economies.
It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for ‘local affordable food’ outlined in SP5.

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach.”

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to
consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and
Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: “Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food
infrastructure within walking distance of new residential areas.” This addresses diet related health inequalities, encourages healthier communities and aligns with HIA
guidance.

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply
chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable
agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models.

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses - to include the following wording: “Rural diversification proposals that support agro-ecological farming, sustainable local food production,
community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations.”

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel
Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022
01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing
flooding and making use more comfortable during hot weather (such as shading from trees). We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

SP13 Community infrastructure and planning obligations:

We want to take this opportunity to highlight the challenges that population growth places on healthcare services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's

community healthcare facilities and infrastructure. Please refer to the information provided as part of the background evidence paper titled 'BP37
Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within
existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new
developments to take forward its strategic objectives.

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space Assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres. Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.”
There is no reference to the expectation that local communities are consulted in relation to the development of community facilities. We would like to see a
requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and
challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities
that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales’ push for local supply resilience, this is a major opportunity gap. Consider including the following wording:

“Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains.” This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or
urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: “Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing.”

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food
production, short supply chains or sustainable farming practices.
Consider including the following wording: “Development proposals should encourage short supply chains, low-carbon farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives.”

Change suggested by respondent:

It is recommended that the Key Site schedules include minimum on-site provision standards and delivery phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population
growth.

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

6966 Comment

Document Element: HG1 - HOUSING ALLOCATIONS

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities

CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
Our representations on the site allocations are included in appendix 2.
We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the 'domestic' supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.
Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site
Our representations on site allocations are provided in the table below. The following caveats are applicable to all sites:
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion.
• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses

Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
The following provisions are applicable to all allocated employment sites:
• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
• Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcements.
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

7035 Comment

Document Element: HG1 - HOUSING ALLOCATIONS

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP's Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation

properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.

General Approach to Designated Sites

In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.

We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.

By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.

We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.

With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.

Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.

It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of “areas of high ecological value” will also go some way towards resolving the points we raise.

Master Planning

We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.

Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.

Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.

Strategic Opportunity at Bro Tathan

In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.

This will ensure that development in the area:

• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.

Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.

Areas of High Ecological Value

As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of ‘High Ecological Value’ (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.

2. Integrated Sustainability Assessment (ISA)

With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to

mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within

the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure
Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological
connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to ‘6 broad habitat types’ including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to ‘6 broad ecosystems’ to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP’s Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:

• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.

HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development

would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it “is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary”.
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW’s Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of ‘Policy DNP8 – Severn Estuary Recreational
Pressure’ within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of ‘Policy DNP8 – Severn Estuary Recreational Pressure’ within the deposit plan, which as above, we advise needs
clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.

We note that paragraph 6.25 of the HRA states that “three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar”. However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

7038 Object

Document Element: HG1 - HOUSING ALLOCATIONS

Respondent: Marion morgan [2413]

Agent: Geraint John Planning Ltd

Summary:

We consider that the Plan is too reliant on the delivery of ‘key sites’ to meet the housing need over the Plan period. We object to the current housing supply to allocate 2,278 no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.
There is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan.
It is considered that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed ‘Strategic Growth Area’ which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ystradowen area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the

rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:
VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Ystradowen. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The

greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months
• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought

about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now

further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:
Table 6: Existing LDP allocations to be carried forward

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.
Extract of Housing Trajectory (annotated by GJP - red dotted line)

It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.
Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.
HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.
Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.
It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land at Ystradowen (Site ID: 430 / 4060) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) and Annex 2 for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 230 affordable homes in the Cowbridge housing market area / ward - which Ystradowen is located within. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation – see Annex 2.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ystradowen and the proposed site. As outlined within these representations, it is considered that the site (ID 430) represents a sustainable, deliverable and acceptable site. The site is located within 2.7 miles Cowbridge and 2.8 miles of Pontyclun. Due to the availability of frequent bus services, and active travel links, key services are readily available to access for any residents within Ystradowen without the need to travel by car. The site is within a maximum 9- and 14-minute bus journey (respectively) of the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Accordingly, the settlement of Ystradowen represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ystradowen, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.
As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 "For the purposes of this policy, 'small-scale' will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."
The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.
SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

Deliverability of the Site

In summary, the site seeks to deliver the following key elements:

• Provision of circa 67 new-build residential dwellings (including 50% affordable housing provision);
• A mix of house-types and tenures across the site to cater for a variety of needs;
• Creation of a new primary access into the site;
• Connection to pedestrian links within the wider area;
• Public open space; and
• Green Infrastructure; and
SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

Land at Ystradowen (Site ID: 4060)

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site. The 'Candidate Sites Assessment Deposit Plan Stage v2' for 'Land at Ystradowen (Site ID: 4060)' sets out that the position of the site at the Deposit Stage is as follows:

"Amendment of proposed use from housing to affordable housing led. Previous site reference 430. The original assessment concluded that whilst the site was adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.
The LDP site in question has subsequently been granted planning permission for housing. This site will serve the future needs of residents in the area and it is not considered that additional land should be allocated in this location."

In terms of the first paragraph, the assessment/conclusion implies and suggests that 'Land at Ystradowen' (4060)' does not adjoin the existing LDP settlement boundary as the allocated site ('Land off Sandy Lane, Ystradowen') has not been built out – "by virtue of an existing adopted plan LDP allocation this is currently under review". Detailed representations have been made and submitted previously at the Housing Trajectory (see Appendix B& C) that outlines that this is fundamentally incorrect. This is not repeated in full here, with just the main points re-iterated.

First and foremost, 'Land at Ystradowen (4060)' directly adjoins the existing LDP settlement boundary. Secondly, there has been a significant change in the position and circumstances. The allocated site ('Land off Sandy Lane, Ystradowen') is currently being "built out", with work commencing on site (see photographic evidence in Appendix C)
- post the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024). Accordingly, the site no longer adjoins "the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review". Given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.

With regards to the second paragraph, the assessment/conclusion outlines that "The LDP site … will serve the future needs of residents in the area and it is not considered that additional land should be allocated in this location". The arguments and case presented in Appendix B & C. There is a clear overreliance on 'rolled forward' sites / existing allocated sites. A total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%). We believe that a greater level of growth is achievable and should be considered. Not least as there is an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings). As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy. Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply. The "future needs of residents in the area" will therefore not be met/served by just this site, and it is considered that additional land should be allocated in this location.

Furthermore, to reinforce, illustrate, and evidence the point in specific reference to the site the subject to this representation (located in Ystradowen), reference is made to application ref. 2013/00856/OUT – 'Land off Badgers Brook Rise, Ystradowen'. The Final Report of the application states that "Ystradowen is considered a sustainable settlement for further housing development" – i.e. "additional land should be allocated in this location".

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan (see Appendix B), a similar 'scoring' exercise has been undertaken as part evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage can be seen below for reference:
BP18 Candidate Ste Assessment at Preferred Strategy Stage

As demonstrated above, there has been a positive change to the scoring attributed to the site ('Land at Ystradowen'). The change is a positive change to the 'Infrastructure Availability' section changing from: 'Grey' (no score) to 'Amber'. Infrastructure Availability is outlined as: "Existing or proposed services would be suitable subject to local improvements without impacting on development viability and/or delivery timescales" (see below):
The explanation for the scoring provided by the Vale sets out that "Sites will be assessed against the availability of water connections to the site, in addition to the method of foul sewage disposal from the site. Consultation shall be undertaken with DCWW to determine whether there is sufficient capacity to the wastewater treatments works, and how it links into DCWW's Capital Investment Programme.
Where consultation indicates limited capacity, or the site is located away from a viable connection this may impact on the deliverability/viability of a site should this require significant connection costs or upgrades. Consequently, the Council shall require site proposers to undertake detailed site viability assessment to determine the impact that additional cost shall have on development cost and deliverability timescales."

As set out above, this is a positive change. This is most likely derived from the allocated site ('Land off Sandy Lane, Ystradowen') currently being "built out", with work commencing on site that would facilitate and improve the 'Infrastructure Availability'. This re-iterates the point made previously re the incorrect assessment reached, and the ever changing position of this site – which will only improve given the neighbouring allocated site ('Land off Sandy Lane, Ystradowen') being "built out".

Land West of Maendy Road, Aberthin (Site ID: 2299)

There are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and the site the subject of these representations. It is therefore considered pertinent to assess and compare the suitability of 'Land West of Maendy Road, Aberthin'. Not least as 'Land at Ystradowen (Site ID: 4060)' is for a "small-scale affordable housing led development in a minor rural settlement", within "the ward of Cowbridge".

The site 'Land West of Maendy Road (Site ID: 2299)' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however from our review of the evidence base submitted as part of the Housing Trajectory consultation, there was no assessment and critique of this site at this stage. This raises questions regarding the "soundness" of this site, given it appears this sites acceptability and inclusion was pre-determined.

The site ('Land West of Maendy Road') has since had a detailed assessment and critique published, however concerns still remain regarding the "soundness" of the site which forms part of the intended housing land supply. The 'Stage 2 Detailed Site Assessment' summary undertaken for 'Land West of Maendy Road' has been extracted below:

"The site is proposed for a small-scale affordable housing led development in a minor rural settlement, which would accord in principle with the strategy. Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent.
The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that."

As mentioned previously, there are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)' (the subject of these representations). Firstly 'Land at Ystradowen (Site ID: 4060)' is also for a "small-scale affordable housing led development", that is "in a minor rural settlement" (Ystradowen). Accordingly, it should follow that as 'Land West of Maendy Road, Aberthin (Site ID: 2299)' "would accord in principle with the strategy", 'Land at Ystradowen (Site ID: 4060)' would also "accord in principle with the strategy".

Furthermore, there is no material difference between the following assessment of Aberthin and Ystradowen:

"Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent."

There is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms.

As set out in our representations to the Preferred Strategy, we reviewed the key services in proximity to the site. The following services were identified as part of that review:

• In terms of public transport, there are two bus stops located approximately 0.2 miles (4-minute walk) from the site ('Land West of Maendy Road'), with the 321 providing services between Llantwit Major and Talbot Green;

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin;

• The site is also located 0.2 miles (4-minute walk) from The Farmers Arms Pub and 0.2 miles (4-minute walk) from The Hare and Hounds Inn; and

• The site is located 0.2 miles (5-minute walk) from Aberthin Village Hall.

Given the above, "The settlement (Ystradowen) is also served by public transport".
Furthermore, Ystradowen is located only 2.7 miles from Cowbridge (9-minute bus journey). The "primary and secondary school provision with the wider range of services and facilities in Cowbridge" mentioned in relation to Aberthin are therefore also in close proximity to Ystradowen.

Given the above, any candidate site at 'Land at Ystradowen' (the subject of these representations – Site ID: 430 / 4060) is no less sustainable than the site at Aberthin (Site ID: 2299).

Not least as the following additional key services are located within Ystradowen and therefore in close proximity to the promoted site:

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'; and
• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Furthermore it is important to note that the above scoring criteria is very limiting, and does not take into account the important role and proximity of settlements in a wider context. For example, it does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant) – see Appendix B for full details.

In addition, as set out within the representations made in relation to the House Trajectory (Appendix C), the following extracts have been taken from the Officer's Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:
As set out above, it is important to note that the Final Report of application ref. 2013/00856/OUT states that "Ystradowen is considered a sustainable settlement for further housing development", due to "the sustainable nature of the settlement". Furthermore, the Final Report of app ref. 2023/00948/FUL states:

• "Notwithstanding this, the site is located in close proximity to local services and there is a bus stop located nearby. Whilst the comments relating to the reliance and frequency of the bus services have been considered, there still remains a bus service in the area"; and
• "Firstly, as aforementioned, many neighbouring comments refer to the site as unsustainable and have commented on the suitability of public transport and cycle routes etc. This has been addressed above."

The above clearly evidences that the location has previously been endorsed as, and is currently still found to be, sustainable.

Accordingly, it can be considered therefore that if the proposed allocated site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen (Site ID: 430 / 4060)' is equally suitable to be an Affordable Housing Led Allocation.

The second section/paragraph of the assessment states:

"The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that."
'Land at Ystradowen (Site ID: 4060)' is also located within "the ward of Cowbridge". As per the above and outlined by the Authority, there is "a need for 230 additional affordable units over the next 15 years". It is clear therefore that there is a need for additional affordable units in this ward, and this site would therefore also help to alleviate this need.

This position is a direct contradiction of course of the assessment/conclusion for 'Land at Ystradowen (Site ID: 4060)' which stated "it is not considered that additional land should be allocated in this location". It is clear from the above however that "additional land should be allocated in this location" to satisfy this "need for 230 additional affordable units over the next 15 years" – which 'Land at Ystradowen (Site ID: 4060)' can do. This is not least the case given the detailed arguments, case and representations presented and evidenced previously above and in Appendix B & C.
To briefly reiterate there is a clear overreliance on 'rolled forward' sites / existing allocated sites which has resulted in the unmet need deriving from the existing LDP being still present. A greater level of provision for new allocations should therefore be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply, so these can "make an important contribution in meeting" the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" – which 'Land at Ystradowen (Site ID: 4060)' can do.

As set out within the representations made in relation to the housing trajectory (see Appendix C), a further key

consideration to note and one which does differentiate between the relative merits of the 'Land at Maendy Road, Aberthin' and 'Land at Ystradowen' is that the LDP Proposals Map demonstrates that 'Land West of Maendy Road' is within a Special Landscape Area - see below:
Vale of Glamorgan Proposals Map (Land West of Maendy Road outlined in red
Under Policy MG17 'Special Landscape Areas' it is considered that development in SLA could pose an "unacceptable harm to the important landscape of the area". Accordingly, this development and proposed allocation could therefore cause "unacceptable harm to the important landscape of the area".

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any "unacceptable harm to the important landscape of the area".
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)
It is noted that the detailed assessment scores the site 'amber' in respect to Special Landscape Area (refer to / see later section for full details), with the assessment methodology setting out that "the site is located within a Special Landscape Area/The Glamorgan Heritage Coast and the development may result in little or no change in character and little or no significant effect on landscape character and visual amenity."
A detailed assessment of the impact upon the SLA in respect to the development of 'Land West of Maendy Road, Aberthin' should therefore be, and will need to be, undertaken as part of any planning application. If it is found that the site causes "unacceptable harm to the important landscape of the area", this will lead to this proposed allocation being at risk of not being delivered. This will be as a result of its impacts and acceptability at the planning application stage that the landscape and visual impact of development of the site is unacceptable. As such, these proposed affordable units are at a potential considerable risk of being lost and not satisfying the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" – which 'Land at Ystradowen (Site ID: 4060)' can do as it is not located in an SLA.

In addition the draft housing trajectory set out that "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" is not provided for. This is clearly an issue. Given however 'Land at Ystradowen' does not sit within a SLA – and so not pose any potential concern or cause any "unacceptable harm to the important landscape of the area" – the allocation of this site would be more suitable and "safer" - as there would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for, and the need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" would be satisfied.

As mentioned previously, a detailed assessment and critique has now been undertaken of 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part evidence base for the Deposit Plan using the similar 'scoring' exercise. As such, it is again pertinent to consider and respond to the Council's 'scoring' exercise assessment of the site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part of these representations.

The 'Summary of Assessment of New Candidate Sites' table can be seen overleaf for reference:
BP18A Candidate Site Assessment at Deposit Plan Stage
A comparison between the site assessments undertaken for both 'Land West of Maendy Road, Aberthin (Site ID: 2299)' (on the left), and 'Land at Ystradowen (Site ID: 4060)' (on the right) has been undertaken, and can be seen below for reference:

Having undertaken a review of the scoring for both 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)', it is clear that 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)':

• 'Land at Ystradowen (Site ID: 4060)': 17/33 criteria are scored green = 52%

• 'Land West of Maendy Road, Aberthin (Site ID: 2299)': 12/34 criteria are scored green = 36%

It is clear therefore given the above that 'Land at Ystradowen (Site ID: 4060)' is a better site, and should be allocated accordingly.

One key example to note is how the criterion 'Access to Services and Facilities' has been scored. For 'Land at Ystradowen (Site ID: 4060)' this has been scored green, yet for 'Land West of Maendy Road, Aberthin (Site ID: 2299)', this has been scored red. Given this, this corroborates the position outlined previously above that, if the proposed allocated site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen (Site ID: 430 / 4060)' is equally as sustainable – in fact considered more suitable (given its higher scoring in this respect).

Furthermore, we question the "soundness" of the assessment of 'Land West of Maendy Road, Aberthin (Site ID: 2299)', given that 7/34 (21%) of the criteria do not appears to have not been assessed – i.e. 7/34 (21%) of the criteria are

scored grey. This raises questions regarding the “soundness” of this site, given it appears this sites acceptability and inclusion was pre-determined.

It is clear therefore that if ‘Land West of Maendy Road, Aberthin (Site ID: 2299)’ has been deemed acceptable for allocation, yet ‘Land at Ystradowen (Site ID: 4060)’ scores higher/more positively (i.e. green) than this site, ‘Land at Ystradowen (Site ID: 4060)’ should also be deemed acceptable and be allocated. Not least as the site is “proposed for a small-scale affordable housing led development in a minor rural settlement … would accord in principle with the strategy”, and “could make an important contribution in meeting “a “need for 230 additional affordable units over the next 15 years” in “the ward of Cowbridge”.

Summary and Conclusion

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Deposit Plan published as part of the consultation.

In terms of SECTION 4, and a response to the Candidate Site Assessment at Deposit Plan Stage, the following key points have been made:

• The Council’s ‘Stage 2 Detailed Site Assessment’ justification for ‘Land at Ystradowen (Site ID: 4060)’ is fundamentally incorrect;

• Given the material positive similarities between ‘Land at Ystradowen (Site ID: 4060)’ and ‘Land West of Maendy Road, Aberthin (Site ID: 2299)’, which has been deemed acceptable and allocated, ‘Land at Ystradowen (Site ID: 4060)’ should also be deemed acceptable and allocated accordingly;

• ‘Land at Ystradowen (Site ID: 4060)’ would help to alleviate and satisfy “a need for 230 additional affordable units over the next 15 years” within “the ward of Cowbridge”; and
• ‘Land at Ystradowen (Site ID: 4060)’ scores higher/more positively (i.e. green) than ‘Land West of Maendy Road, Aberthin (Site ID: 2299)’, and so should also be deemed acceptable and be allocated;

Ultimately, ‘Land at Ystradowen (Site ID: 4060)’ is “proposed for a small-scale affordable housing led development in a minor rural settlement”, and as such “would accord in principle with the strategy”. It would therefore “make an important contribution in meeting“ the “need for 230 additional affordable units over the next 15 years” in “the ward of Cowbridge”.

We would therefore object the Council’s assessment that the site is not considered suitable for development.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it’s consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the ‘new’ sites / provision;
8. Detailed comments in respect to ‘new’ sites;
9. Credentials of this site subject to this submission; and
10. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing-led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been

presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:
Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the east of Coliwinston, Colwinston.

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB,

s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicted in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.
Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.
The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.
Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.
Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;

• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:
Table 6: Existing LDP allocations to be carried forward
The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.
Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of

expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and

built out in locations such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision.
Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".
As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision, and as such, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations

Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
Candidate Site Stage 2 Assessment (Site Ref. 404)
The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:
"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clearly evident deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly

available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Despite the absence of site-specific assessment criteria, as the RLDP preferred strategy states a key objective guiding site selection is that the Plan will "provide for vital and vibrant rural communities whilst protecting the countryside through the delivery of growth in sustainable locations related to the settlement hierarchy alongside the provision of supporting infrastructure" (Objective 7 'Fostering Diverse Vibrant and Connected Communities'), it is reasonable to assume that the Council considers 'Land West of Maendy Road' to be a 'sustainable' location.

Given this, we have reviewed the key services in proximity to the site. The following services were identified:

• In terms of public transport, there are two bus stops located approximately 0.2 miles (4-minute walk) from the site ('Land West of Maendy Road'), with the 321 providing services between Llantwit Major and Talbot Green.

• The site is also located 0.2 miles (4-minute walk) from The Farmers Arms Pub and 0.2 miles (4-minute walk) from The Hare and Hounds Inn.

• The site is located 0.2 miles (5-minute walk) from Aberthin Village Hall.

Aberthin is in close proximity (1.2 miles/14-minute walk) to the key settlement of Cowbridge - which is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Considering this, there is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms. Given that Ystradowen is located only 2.7 miles from Cowbridge (9- minute bus journey), the candidate site at 'Land at Ystradowen' is no less sustainable than the site at Aberthin. The following key services are within Ystradowen and therefore in close proximity to the promoted site:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin.
• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Accordingly, it can be considered therefore that if the proposed allocated site 'Land West of Maendy Road, Aberthin' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen' is equally suitable to be an Affordable Housing Led Allocation.
Furthermore, to reinforce the above position and to illustrate and evidence the site's sustainability, the following has been taken from the Officer's Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:
Reference is made in the Final Report of app ref. 2013/00856/OUT which states that "Ystradowen is considered a sustainable settlement for further housing development", due to "the sustainable nature of the settlement".

Furthermore, the Final Report of app ref. 2023/00948/FUL states:

• "Notwithstanding this, the site is located in close proximity to local services and there is a bus stop located nearby. Whilst the comments relating to the reliance and frequency of the bus services have been considered, there still remains a bus service in the area."
• "Firstly, as aforementioned, many neighbouring comments refer to the site as unsustainable and have commented on the suitability of public transport and cycle routes etc. This has been addressed above."

The above clearly evidences that the location has previously been endorsed as, and is currently still found to be, sustainable.

A further key consideration to note and one which does differentiate between the relative merits of the 'Land at Maendy Road, Aberthin' and 'Land at Ystradowen' is that the LDP Proposals Map demonstrates that 'Land West of Maendy Road' is within a Special Landscape Area - see overleaf:
Vale of Glamorgan Proposals Map (Land West of Maendy Road outlined in red)

Under Policy MG17 'Special Landscape Areas' it is considered that development in SLA could pose an "unacceptable harm to the important landscape of the area". Accordingly, this development and proposed allocation could therefore cause "unacceptable harm to the important landscape of the area".

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any "unacceptable harm to the important landscape of the area".
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)

This is a significant factor to consider. 'Land West of Maendy Road, Aberthin' causing "unacceptable harm to the important landscape of the area" will lead to this proposed allocation being at risk of not being delivered by virtue of detailed assessments of its impacts and acceptability at planning application stage holding that the landscape and visual impact of development of the site is unacceptable. As such 25 affordable units will be lost from the proposed affordable 122 units, and ultimately being lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" is not provided for. This is clearly an issue. Given however 'Land at Ystradowen' does not sit within a SLA – and so not pose any potential concern or cause any "unacceptable harm to the important landscape of the area" – the allocation of this site would be more suitable and "safer" - as therefore would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.
Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)
As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:
Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:
In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Ystradowen', the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below. With reference to the above:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green.

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities.

Furthermore, the settlement of Ystradowen has been ranked highly in the VoG Sustainable Settlements Appraisal, scoring a total of 14 points according to the distance to key services and facilities available. This places Ystradowen 26th out of a total of 87 settlements. As a result, this would be deemed a suitable area to accommodate growth.

As stated above the key settlement of Cowbridge is located in close proximity being only 2.7 miles to the south and a 9-minute bus journey. Cowbridge is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Furthermore, it is important to note that the above criteria does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant). These areas comprise for example the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Given the above, 'Land at Ystradowen' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Ystradowen' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.
Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref. 2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.
Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Credentials of this site subject to this submission

There has been a significant change in the position and circumstances since the promoted site herein was assessed at Candidate Site Stage and the Assessment undertaken. The Stage 2 Assessment of the site concluded the following: 'Whilst adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.' The assessment/conclusion implies that as this site ('Land off Sandy Lane, Ystradowen') has not been built out and is "currently under review", it suggests that 'Land at Ystradowen' (430) does not adjoin the existing LDP settlement boundary. Given recent developments however associated with the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024) and the site being currently being "built out" and work commencing on site, the site no longer adjoins "the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review". Accordingly, and given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.
The following specific photo evidences 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48) is being built out the western boundary of the promoted Site ID 430. This therefore clearly highlights that the site's boundary is representing the existing settlement limit in the existing development plan. Accordingly, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the existing LDP settlement boundary.
Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gr
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3gt
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g4
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g7
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3g8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gv
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gc

7073 Comment

Document Element: HG1 - HOUSING ALLOCATIONS
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.

Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.

That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.

The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.

The remainder of these representations address the specific policies of the Deposit Plan.

Deposit Plan Plan Period Position: Object

Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.

On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.

Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.

Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part

Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.

Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.

This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.

St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.

Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:

"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)

Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:

St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.

Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.

Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity

more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."

The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.
5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.
In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority

with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not

simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.
Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part
Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.
That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.
There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.
The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.
In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.
Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.
The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and

other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.

8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.

The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.

Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:

• the Plan is overly reliant on a small number of key sites;

• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;

• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and

• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.

The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.

Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.

The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:

• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.

• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.

• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.

All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.

In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.

Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is

to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.

Policy CI1 – Open Space Provision

Position: Support in principle / Object in part

Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.

The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.

There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.

Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.

Policy SP4 – Placemaking

Position: Support in principle / Comment

Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.

That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.

Suggested wording amendment:

"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."

That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.

Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part

Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.

However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.

We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.

Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application

documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.

Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part

Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.

Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.

There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.

The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.

Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.

Land at St Nicholas / omission from the Deposit Plan Position: Object to omission

Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.

The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.

Deposit Plan Conclusion

Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.

In particular:

• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;

• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;

• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;

• the Plan relies too heavily on key sites, rolled forward sites and windfalls;

• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and

• the omission of St Nicholas is not justified by the Council's own evidence base.

The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.

For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.

Candidate Site Register - Site ID 486

Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.

Stage 2 Candidate Site Assessment

The Council's Stage 2 Candidate Site Assessment states:

"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."

The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:

Impact upon Character and Setting of the St Nicholas Conservation Area

Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future

development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment
We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the

allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7074 Object

Document Element: HG1 - HOUSING ALLOCATIONS
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

There remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.
The Plan is overly reliant on a small number of key sites. There may be some slippage in the adoption of the RLDP, and we therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one

which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.

Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."
The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.
5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then

until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.
In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by

reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would

reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.

Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part

Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.

The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.

That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.

There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.

The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.

In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.

Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part

Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.

The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.

In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy

Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.

8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.

The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.

Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:

• the Plan is overly reliant on a small number of key sites;

• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;

• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and

• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.

The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.

Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.

The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:

• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.

• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.

• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.

All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.

In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.

Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part

Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.

However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.

Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.
Policy CI1 – Open Space Provision
Position: Support in principle / Object in part
Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.
The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling

requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.
There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.
Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern

standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the

candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment
We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;

• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:
Include additional allocations.

Sound: Not specified

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7105 Comment

Document Element: HG1 - HOUSING ALLOCATIONS
Respondent: Barratt Redrow Homes [2669]
Agent: Turley

Summary:
The table should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.
The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations, can bear the cumulative policy costs of the RLDP, including CC1.

Full text:
Policy SP1 - Sustainable Growth Strategy
Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.
It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.
In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"
Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be

concentrated is supported.

Policy SP2 - Settlement Hierarchy
The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable. As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Policy SP4 - Placemaking
We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.
The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses... ' or to be developed at 'high densities... and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.
Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Policy PGDl - Creating Well Designed and Inclusive Places
There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan

Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be

required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy Cll - Open Space Provision
The wording of Policy Cll, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy Cll should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling

metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy CII requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:
Amend table.

Sound: Not specified

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7138 Object

Document Element: HG1 - HOUSING ALLOCATIONS
Respondent: Peter Stone Properties Ltd [1182]
Agent: Geraint John Planning Ltd

Summary:

We consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. We object to the current housing supply to allocate 2,278 no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.
There is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan.
It is considered that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £800,000 over the last 12 months, there is a clear and established need for new homes in the Bonvilston area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve,

paragraph 6.132 of the Deposit Plan outlines the following:

“Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided.”

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision’s clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Bonvilston. The Vale is characteristically ‘rural’, and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the “soundness” of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states “The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities”. The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of ‘key sites’ to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

- Land at North West Barry – 376no. units;
- North of Dinas Powys – 250no. units;
- Land at Readers Way, Rhoose – 520no. units;
- Land at Church Farm, St Athan – 532no. units; and
- Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a

risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of

completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required

that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites – not least given that 3 of the 4 allocated affordable housing-led sites are located west of Cowbridge.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic

growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land South of A48, Bonvilston (Site ID: 435 / 3857) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area (which Bonvilston is located within), and a need for 242 affordable homes in the Wenvoe housing market area. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

Securing further delivery of Affordable Units

As set out above, it can be assumed that the affordable housing-led allocated sites only provide 61no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included

within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to meet the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Bonvilston and the proposed site. As outlined within these representations, it is considered that the site (ID 435 / 3857) represents a sustainable, deliverable and acceptable site. This proposed allocation is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

• Cowbridge Comprehensive School;
• St Nicholas Primary School;
• Cowbridge Health Centre; and
• Cowbridge town centre for various Retail Services.

Accordingly, the settlement of Bonvilston represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Bonvilston, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a ‘cap’ of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a ‘cap’ limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy

would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 “For the purposes of this policy, ‘small-scale’ will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites

with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area.”

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in ‘Annex 2’ of our representations, the site has overcome the ‘constraints’ set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

Deliverability of the Site

In summary, the site seeks to deliver the following key elements:

• In summary, the opportunity of the site seeks to deliver:
• Residential development comprising up to 25 dwellings, with at least 50% affordable housing in accordance with Policy SP2,
• Highways infrastructure within the site;
• Upgraded access to the site;
• Strong legible pedestrian and cycle connections throughout the site and with the existing settlement;
• Green Infrastructure; and
• Sustainable Drainage Systems (SuDS).

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the “soundness” of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan’s housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to the current wording of the HG5 Policy ‘Affordable Housing Exception Sites’ which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council’s assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale’s identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will

benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land South of the A48, Bonvilston (Site ID: 3857) sets out that the position of the site at the Deposit Stage is as follows:

"Notwithstanding the amendment from a market led to an affordable housing led scheme (original CS 435), the other reasons why the site was previously discounted still remain.
The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area.
Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48.
The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable. There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing."
Conservation Area
In terms of the assertion that "The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area, this is strongly disputed.

Whilst it is acknowledged that the site lies within the Bonvilston Conservation Area, the conclusion that it would be adversely affected is not considered to be accurate. Firstly, the site as it currently stands, consists of an open field. This does not match the conservation area which is characterised primarily by residential dwellings of varying densities, and as such, it is considered that development of the site with sensitively designed buildings would enhance as opposed to harming its surroundings.

Secondly, the large residential development to the north of the site, 'Land at Sycamore Cross' ref. 2015/00960/FUL encroaches on the Bonvilston Conservation area but was deemed acceptable by the LPA. Although not all of the site is within the Conservation Area, it's encroachment and presence adjoining and surrounding a large proportion of the area is considerable and was deemed acceptable by Officers in 2017. Given this, a development at the Land South of the A48 should be deemed acceptable, as it follows the same principles albeit at a much smaller scale.

Highways
As for the statement that "Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48", this is also strongly disputed.

The site is located immediately adjacent to the adopted highway where it is proposed to upgrade and enhance the existing gated access point. Due to the existing access point, it is not considered that 'major' highway mitigation works would be needed, rather this would be enhanced and improved as part of the proposed development. Furthermore, given the nature of the road, with long views extending in both directions, it is anticipated that appropriate visibility

splays could be achieved to enable safe access and egress. As such, it is considered that the site would achieve appropriate highway access within the need for "major" highway mitigation works.

Agricultural Land Classification
The Detailed Site Assessment also sets out that "The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable." This is strongly disputed.

A review of the Agricultural Land Classification Predictive Map indicates that the site lies primarily within 'Grade 2: Very good quality agricultural land' but no Grade 1 land is present. Further assessment and tests to establish the quality would therefore be undertaken in due course to confirm the quality of the land. However, it is not considered that it would be suitable to farm in any event given the location immediately adjoining existing residential development and the fact that it is within private ownership. Overall, given that the site is relatively small with a gross area of 0.88 hectares, it is not considered that its development would result in a detrimental or significant loss of agricultural land – not least given that site is not capable of beneficial agricultural production due to its limited size.

Housing / Housing Land

Further to the above, it is also set out that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing", however, this is not considered to be entirely accurate.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area and a need for 242 affordable homes in the Wenvoe housing market area. This need has not been met through the allocations of sites within the RLDP, nor has it been met through outstanding commitments.

As outlined in Annex 1, it can be assumed that the affordable housing-led allocated sites will only provide for 61no. affordable dwellings within the Rural Vale, comprising 4no. sites that are expected to deliver approximately 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. Therefore, more sites should be allocated in order to secure the delivery of a higher number of affordable housing units to meet the target.

As set out within Annex 1, it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, however, there is serious concern regarding the deliverability of these sites, which would result in a significant gap in the total affordable housing that is delivered. Therefore, allocating a greater number of affordable housing-led sites would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in the both the overall affordable housing need, and the need for the St Nicholas & Llancarfan housing market area, being unmet, with demand continuing to outstrip supply.

The LHMA 2023 sets out the existing stock and planned supply of affordable housing over the next 5 years (up until 2028). This assessment found that the housing market area of St Nicholas & Llancarfan has a committed supply of 4no. one beds, 11no. two beds, and 3no. three beds, with 2 no. three beds as expected re-lets. The assessment also identifies a committed supply of 39no. units for intermediate housing.

The LHMA also sets out the existing stock and planned supply for Wenvoe, identifying the committed supply of social rent homes to be 12no. one beds, 11no. two beds, and 5no. three beds, with 7no. one beds and 8no. two beds as expected re-lets. There is no committed supply for intermediate housing in Wenvoe.

It should be noted that the development of 'Land East of Nicholas' (Campbell Court and Cae Newydd), has now been completed, and as such, can not form part of the housing land available. The latest Pre-Application Response for the site subject to these representations (Land South of the A48, Bonvilston) accounted for the development of the site in

St Nicholas, stating that "even after the developments at St Nicholas and Culverhouse Cross, there was the need in the Wenvoe ward for 1 Bed 71, 2 Bed 49, 3 Bed 29, 4 Bed 7, 5 Bed 5, Total 161".

It should also be noted that there are existing commitments within the Bonvilston area ('Land to the east of Bonvilston'), however, the deliverability of the existing commitment is seriously questioned. Application Ref. 2015/00960/FUL was approved in July 2017, with the Housing Land Supply and Housing Trajectory Report (December 2025) confirming that of the total 120 units permitted, only 40 had completed by 1st April 2025, with the remaining 80 units not started by this same date. Of the 80 units not started, 25 units are affordable homes.

It is well known that phase 1 of the development at 'Land to the east of Bonvilston' has faced difficulties which has led to the development remaining incomplete. This does of course put into question the overall deliverability of the site, and raises concerns about the units that were, and still are, required within the Bonvilston area.

The allocation of the site promoted herein would not only help in the short term in meeting the overall affordable housing target for the Plan, but would also assist in meeting the unmet needs of affordable housing within Bonvilston – not least given the serious concern regarding the deliverability of the committed supply of housing within the St Nicholas & Llancarfan housing market area.

For the reasons set out above, and in light of the information provided within the LHMA 2023 and the Housing Land Supply and Housing Trajectory Report (December 2025), it is evident that there is considerable need for affordable housing within Bonvilston, and accordingly, the housing market areas of St Nicholas & Llancarfan, and Wenvoe. There have not been any sites allocated to assist within meeting the local need, and more sites should be allocated in order to secure delivery of a higher number of affordable housing units to meet the overall target of the Plan.

The contention that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing" is therefore strongly disputed – not least given that there is a clear and evident need to allocate more affordable housing-led sites in order to meet the target set out in the Plan.

Interim Summary

In summary, it is considered that the site subject to these representations would not have an adverse impact on the character and setting of the Bonvilston Conservation Area, nor would major highway mitigation works be required to enable safe vehicular access on to the A48. Moreover, it is considered that the site's classification as BMV Agricultural Land does not pose a fundamental constraint to development – as the site represents a relatively small parcel with a

gross area of 0.88 hectares, which is not capable of beneficial agricultural production due to its limited size.

There is also a considerable need for the affordable housing in Bonvilston and the housing market area of St Nicholas & Llancarfan. The site promoted herein would assist in meeting these local needs and should be allocated accordingly.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage

As demonstrated above, there has only been one change to the scoring attributed to the site, this being a change from 'red' to 'amber' for 'Developer Interest'. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with these representations accordingly (see Appendix B).

Whilst detailed submissions were made on the previous assessment, it is considered pertinent for the scoring of the key criteria's to be addressed as part of these representations. As such, these have also been discussed below.
Developer Interest

As set out above, the Detailed Site Assessment for 'Developer Interest' has changed from 'red' to 'amber'. The assessment methodology for this section of the assessment has been extracted below for reference.

As set out above, 'amber' refers to there being no development interest identified at this stage, however, there is evidence to indicate that the site is being actively promoted by the owners.

The representations made to the Preferred Strategy (Appendix B) sets out that whilst the site does not yet have an agreement with a developer to take on the land, it is considered that this would be achieved should the site be allocated, and planning permission granted. Newydd Housing association have been engaged previously and had agreed to take the site forward as a 100% affordable scheme, albeit is also considered that they could take on the affordable units as part of a mixed tenure scheme.

In addition to Newydd, the site promoter has also received an offer from a private social housing provider who would be prepared to support the site as a mixed tenure scheme.

This position has not changed since the Preferred Strategy stage, and is considered that there is continued developer interest for the site. This is not considered to change at any point – not least given the discussions held between the owners of the site in questions and developers of interest.

Environmental and Physical Constraints

As set out at the Pre-Application Stage. the site underwent a Preliminary Ecological Appraisal in September 2022 which identified that whilst some precautionary measures were recommended in terms of protecting priority habitats and reptiles, the site is not fundamentally constrained from development on ecological terms. Given this, it is considered that further ecological surveys would be undertaken at the planning stage to inform any development proposals and ensure the safeguarding of the natural environment.

Access to Key Services (Retail, Primary Schools, and Health Services) and to Services and Facilities

As set out within the representations made to the Preferred Strategy, the site is located within a maximum of a 20-minute bus journey to a version of every key service listed, due to the proximity of the site to settlements such as Cowbridge, Culverhouse Cross and St Nicholas. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Bonvilston without the need to travel by car.

To reiterate, the site 'Land South of the A48, Bonvilston' is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Concluding this allocation as 'unsustainable' in regard to 'availability of local facilities in and around settlements' is not accurate. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

• Cowbridge Comprehensive School;
• St Nicholas Primary School;
• Cowbridge Health Centre; and
• Cowbridge town centre for various Retail Services.

It should also be noted that Bonvilston contains a number of facilities within a short and level walking distance of the site, including the village shop and Café, as well as the Red Lion Public House.

Given the accessibility of the site to other settlements, and the fact that these are made accessible by bus and active travel routes, it is considered that the site should be concluded as sustainable in regard to access to key services.

Summary and Conclusion

As evidenced above, and within the representations made to the Preferred Strategy (Appendix B), there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location, and site, are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston.

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder

time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicated in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.

Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question

whether this allocation is “sound” (i.e. its allocation is considered to be “unsound”).

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of ‘Land to north and west of Westwinds Business Park’:

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above the site was not considered suitable for further consideration with the site scoring negatively (red) in a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in ‘Sustainable Transport – Public Transport’, this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states “New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes”. Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states “new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport.”

It is well known residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need “To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy”. To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to “Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure”. In addition, Promoting Active and Sustainable Travel Choices outlines to “Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel”.

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory “there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities”. There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A “small scale

affordable housing led development” which is needed to “respond to local affordable needs and help sustain services and facilities within these rural communities” will therefore not be provided for. This is clearly an issue.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above the site was rejected and considered not suitable for further consideration. In fact, and unlike ‘Land at Heol Fain, Wick’ and ‘Land to north and west of Westwinds Business Park’ it was stated that this site “could not be

considered as a suitable affordable housing led development site". Despite this, this site has been outlined as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Land South of A48, Bonvilston.

Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3jp
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3kr
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k3
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k6
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kf
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kh
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z5

7160 Object

Document Element: HG1 - HOUSING ALLOCATIONS
Respondent: Wig Fach Property Company Ltd [2373]
Agent: Geraint John Planning Ltd

Summary:

We consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. We object to the current housing supply to allocate 2,278 no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.
There is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan.
It is considered that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ogmore By Sea area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either Key Settlement, Service Centre settlement or Primary Settlements, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of

further sites within the Minor Rural Settlements, such as Ogmore By Sea. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley

Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and

will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that the should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 124 affordable homes in the St Brides Major local housing market area (which Ogmore is located within). As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

It is questionable whether Wick has the capacity to accommodate 50 new dwellings, given the sustainability and rural nature of the area. As a result, it is suggested that the number of homes allocated in Wick is reduced and that a further allocation in St Brides Major is secured, in order to facilitate supporting the delivery of affordable housing through the housing market area, rather than in one minor rural settlement. The sustainability of Ogmore has been assessed, both by the Council through the Sustainability Appraisal and again, through our assessment of the site.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a

target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4 % of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.

Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ogmore and the proposed site. As outlined within these representations, it is considered that the site (ID xxx) represents a sustainable, deliverable and acceptable site. The site is within a maximum of a 22- minute bus journey to a every key service listed, due to the proximity of the site to settlements such as Bridgend. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Ogmore By Sea without the need to travel by car. The site is located within 5 miles of Bridgend, and within a maximum 22-minute bus journey of the following services:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre for various Retail Services

Moreover, Ogmore has benefitted from the recent development of the Ogmore By Sea Village Hall, which provides space for community activities and events to take place. The hall also includes a coffee shop (Welsh Coffee Company), which only adds further to the daily services provision available within the settlement. Access to the hall and coffee shop is directly provided for pedestrians from the Main Road, which allows for direct access from the site.

Accordingly, the settlement of Ogmore represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

It is acknowledged that the site also lies within the Glamorgan Heritage Coast and this point is addressed further below.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ogmore By Sea, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a ‘cap’ of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a ‘cap’ limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 “For the purposes of this policy, ‘small-scale’ will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate

to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

Policy DNP3 – Glamorgan Heritage Coast

Given that the site is located in the Glamorgan Heritage Coast, it is noted that the following policy is of relevance to any future development on the site. Criteria 4 of Policy DNP3 states:

"The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development that accords with National Policy."
It is also noted that supporting Para 6.422 "In seeking to protect the Glamorgan Heritage Coast, the Council acknowledges that there are some built up areas within the boundary, including the Minor Rural Settlement of Ogmore. In addition, the Vale of Glamorgan rail line crosses part of the Heritage Coast designation in the location where a new station at St Athan is proposed. Whilst being mindful of the need to protect the special qualities of the Glamorgan Heritage Coast, the Council accepts that development within these areas is appropriate, subject to relevant policies of the Plan"(GJP emphasis).

We would offer general support for this policy, and consider this to provide flexibility which allows for certain forms of development. However, we would suggest that the policy wording should be amended to reflect that 'housing' should be supported in the Glamorgan Heritage Coast, providing that the policy exceptions are met. Therefore, the following amendment is proposed as part of the policy should be changed to include "small scale housing" or something similar. The proposed amendments to Policy DNP3 are outlined below in red:

"The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development, including small-scale housing proposals that accords with National Policy."

Again, this would ensure that suitable housing developments can be delivered in the Plan period, to meet the housing needs of the Vale of Glamorgan – particularly in respect of affordable housing.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to Policy DNP3 – Glamorgan Heritage Coast, given the lack of recognition for the potential for small-scale housing proposals;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to

play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land at Hazelwood, Ogmore By Sea (Site ID: 3855) sets out that the position of the site at the Deposit Stage is as follows:

"The original site as ruled out as the development would represent unacceptable intrusion in to the open countryside. Whilst the site has now been identified for an affordable housing led development, the original reason for ruling it out still remains."
In terms of the assertion that "the development would represent an unacceptable intrusion into to the open countryside", this is strongly disputed, in that the development of the site would represent a natural rounding off of the existing settlement boundary. An extract of the site relative to the settlement boundary is provided below, which clearly shows that the development of the site would not extend beyond the existing settlement pattern that exists in Ogmore.

Site Outlined in Red and Settlement Shaded in Blue
As clearly demonstrated in the above mapping, the site would extend no further eastwards than the existing housing area to the south of the site. Equally, the site would not be extending any further north than the existing settlement pattern in Ogmore. This position is further supported by the wider aerial view of the site provided overleaf:

Wider Aerial View of Site Outlined in Red and Settlement Shaded in Blue

In summary, it is considered that the proposed allocation of the site represents a logical rounding off of the existing settlement, as depicted in the mapping provided above – where the site follows the existing envelope of the settlement. The site does not extend any further eastwards than the established built form located immediately to the south; indeed, it sits comfortably within the same development line.

As such, it cannot be considered that the site represents an 'intrusion' into the countryside, as the site would be visually and functionally related to the settlement. It therefore follows that the site would be read as part of the settlement, and not the wider rural landscape.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage
As demonstrated above, there are no changes to the scoring attributed to the site. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with this submission (see Appendix A).

Sustainability

Notwithstanding the above, it is considered that the site represents a more sustainable location than what was previously assessed at Preferred Strategy stage, in light of the Ogmore by Sea Hall development. The Hall acts as a community facility, whereby the space is available for hire by local community groups such as birthday parties, weddings, group meetings, and other such similar uses. Moreover, a café (Welsh Coffee Co) is located within the premises which sells both food and drink.

The hall and café are within walking distance to and from the site, where new access facilities have been implemented from Main Road directly to the building, to allow access for pedestrians and cyclists. This is illustrated in the image below:

Walking and Cycling Facilities

The Tusker Rock pub and post office are also located along Main Road, all of which are within walking distance to the site.

Accordingly, the site is well served by new amenities (i.e. community hall) that comprehensively improves the sustainability of the site / settlement, and in turn, improves the sustainability credentials of the site promotion. It therefore follows that the site represents an acceptable location for residential development, and the site should be looked upon favourably accordingly.

It is also the case, as set out in previous representations, that the site is within a maximum 22-minuted bus journey of the following services and facilities:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre.

As such, key services and facilities can be access by sustainable travel over and above the existing level of provision available in Ogmore By Sea (as discussed above).

Accordingly, the relevant 'red' scorings in the Council's assessment should be updated to reflect the site's suitability and sustainability to accommodate the proposed residential development of the site.

Glamorgan Heritage Coast

Insofar as to the position regarding the site's location within the Glamorgan Heritage Coast, detailed submissions are made not only in the Preferred Strategy representations, but also in Annex 1 of this submission. In short, given the pressing need for such development (particularly affordable housing) to come forward in the Plan period to meet ever-increasing needs, development of this nature should be considered more favourably – not least that, as outlined in this Annex, the site would not extend any further that the existing settlement boundary.

Accordingly, the site would be perceived to form part of the settlement of Ogmore By Sea, and not the wider landscape, and therefore, would not have any detrimental impact on the Heritage Coast in any respect. The scoring should be amended accordingly to reflect this position.

Climate Change

As outlined in previous representations, the development will incorporate climate change measures, such as EV charging points, PV panels, as well as adopting sustainable materials for construction whilst maximising the potential for the dwellings to be energy efficient. Accordingly, the development will be built to high sustainable standards, and therefore, the scoring of the site should be amended as a result.

Summary and Conclusion

It has been evidenced above that there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston;

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• “Time period of pre-application discussions/PAC consultation” = 4 months
• “Time between submission of planning application and determination” = 6 months
• “Time taken from planning consent to the discharge of relevant conditions to enable site construction” = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of “6 months” given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within “4 months” as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicated in the ‘Timing and Phasing of Sites’ table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large ‘spike’ (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren’t spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document "New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an

approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.

Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with

the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and

• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states “New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes”. Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states “new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport.”

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need “To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy”. To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to “Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure”. In addition, Promoting Active and Sustainable Travel Choices outlines to “Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel”.

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory “there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities”. There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A “small scale

affordable housing led development” which is needed to “respond to local affordable needs and help sustain services and facilities within these rural communities” will therefore not be provided for. This is clearly an issue.

When comparing this with ‘Land at Hazelwood, Ogmore By Sea, the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below.

With reference to the above:

• In terms of public transport, there are two bus stops located approximately 200m (3-minute walk) from the site (‘Ogmore By Sea Post Office’), with the ‘303’ providing services between Llantwit Major and Bridgend.

• The site is located 200m (3-minute walk) from the ‘Ogmore By Sea Post Office’ which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

• The site is also located 50m (1-minute walk) from a children’s park.

These services and facilities are therefore well within the best category (i.e. categorised/scored as ‘green’) - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities. This

Furthermore, the settlement of Ogmore By Sea has been ranked higher than Llangan (which the site ‘Land to north and west of Westwinds Business Park’ is located within) in the VoG Sustainable Settlements Appraisal, and therefore, is considered to constitute a more sustainable location to accommodate residential growth. Most notably, Ogmore By Sea scores ‘13’ in respect to ‘Daily Facilities’ whereas Llangan only scores ‘3’, evidencing that residents in Ogmore have much better access to services within the locality as compared to Llangan.

Given the above, 'Land at Hazelwood, Ogmore' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Hazelwood, Ogmore' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help

sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3zt
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3z4
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z6
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3z8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zv
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zc
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zw

4498 Object

Document Element: SP7 – AFFORDABLE HOUSING PROVISION

Respondent: Mr Simon Parker [2821]

Summary:

Your own words state:
backlog of need from people on the housing waiting list is most acute within Barry and Penarth/Llandough

so put the social homes in Barry and Penarth. Why should Rhoose and St Athan have to provide them??

Full text:

Your own words state:
backlog of need from people on the housing waiting list is most acute within Barry and Penarth/Llandough

so put the social homes in Barry and Penarth. Why should Rhoose and St Athan have to provide them??

Change suggested by respondent:

Build the social homes in Barry and Penarth

Sound: No

Attachments: None

4801 Support

Document Element: SP7 – AFFORDABLE HOUSING PROVISION

Respondent: Cwmpas [1874]

Agent: Cwmpas

Summary:

Cwmpas is positive in its response to the Deposit RLDP statements and welcomes the reference to community led housing as noted in Paragraph 6.121.

Full text:

Cwmpas is positive in its response to the Deposit RLDP statements and welcomes the reference to community led housing as noted in:

Paragraph 6.121 – positive response though observation and request would be made to minor amendment to wording that after the words 'co-operative housing' the words 'and other forms of community led affordable housing' are inserted as this would accord with the context of PPW Edition 12 as noted.

Paragraph 6.141 – positive comment and response within the context of Exceptions Policy HG5. However, a request would be made that as well as reference to community land trusts that wording is supplemented with suggested words of 'and other forms and models of community led affordable housing.'

Furthermore, it is considered that the direct reference to community led affordable housing in the Deposit Plan document addresses and removes some of the potential barriers and challenges faced in the delivery of such forms of housing.

It is now clearly the case that PPW supports community-led housing as a form of affordable housing and that, in the view of Cwmpas, this is material to the considerations of Local Development Plan preparation and from which the Vale of Glamorgan Deposit Plan would benefit.

Going forward, however, Cwmpas, would consider that detailed planning policy development within the Deposit RLDP could make an overt and explicit community led affordable housing development reference and with specific community led housing policies in addition to those subsumed within more generic and general housing policies.

Firstly, the addition of a specific reference to community led housing within Policies HG1, HG2, HG3 akin to that within HG5 would enable to the benefits and reach of community led housing to be expanded into mainstream housing policies and allocations and not only Exceptions Policy.

Secondly, it would be considered as beneficial that the Deposit RLDP policies on community led housing development could include a clear definition of this type of affordable housing.

In summary, it is considered that the direct reference to community led housing in the Deposit Plan document as noted in Paragraphs 6.121 and 6.141 represent very positive inclusion and that it addresses and removes some of the potential barriers and challenges faced in the delivery of such forms of housing by drafting specific community led housing policies at the RLDP Deposit Plan stage. However, as outlined, our comments and observations are such as to suggest that references could be further extended within the Housing policies and still be in accordance with the framework of PPW Edition 12, key to the evolution of these policies.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/scd

4803 Comment

Document Element: SP7 – AFFORDABLE HOUSING PROVISION
Respondent: Cwmpas [1874]
Agent: Cwmpas

Summary:

It would be considered as beneficial that the Deposit RLDP policies on community led housing development could include a clear definition of community led affordable housing along the lines of that stated in the document attached to this representation.

Our comments and observations are such as to suggest that references could be further extended within the Housing policies and still be in accordance with the framework of PPW Edition 12, key to the evolution of these policies.

Full text:

Cwmpas is positive in its response to the Deposit RLDP statements and welcomes the reference to community led housing as noted in:

Paragraph 6.121 – positive response though observation and request would be made to minor amendment to wording that after the words 'co-operative housing' the words 'and other forms of community led affordable housing' are inserted as this would accord with the context of PPW Edition 12 as noted.

Paragraph 6.141 – positive comment and response within the context of Exceptions Policy HG5. However, a request would be made that as well as reference to community land trusts that wording is supplemented with suggested words of 'and other forms and models of community led affordable housing.'

Furthermore, it is considered that the direct reference to community led affordable housing in the Deposit Plan document addresses and removes some of the potential barriers and challenges faced in the delivery of such forms of housing.

It is now clearly the case that PPW supports community-led housing as a form of affordable housing and that, in the view of Cwmpas, this is material to the considerations of Local Development Plan preparation and from which the Vale of Glamorgan Deposit Plan would benefit.

Going forward, however, Cwmpas, would consider that detailed planning policy development within the Deposit RLDP could make an overt and explicit community led affordable housing development reference and with specific community led housing policies in addition to those subsumed within more generic and general housing policies.

Firstly, the addition of a specific reference to community led housing within Policies HG1, HG2, HG3 akin to that within HG5 would enable to the benefits and reach of community led housing to be expanded into mainstream housing policies and allocations and not only Exceptions Policy.

Secondly, it would be considered as beneficial that the Deposit RLDP policies on community led housing development could include a clear definition of this type of affordable housing.

In summary, it is considered that the direct reference to community led housing in the Deposit Plan document as noted in Paragraphs 6.121 and 6.141 represent very positive inclusion and that it addresses and removes some of the potential barriers and challenges faced in the delivery of such forms of housing by drafting specific community led housing policies at the RLDP Deposit Plan stage. However, as outlined, our comments and observations are such as to suggest that references could be further extended within the Housing policies and still be in accordance with the framework of PPW Edition 12, key to the evolution of these policies.

Change suggested by respondent:

Request for minor amendment to wording that after the words 'co-operative housing' the words 'and other forms of community led affordable housing' are inserted as this would accord with the context of PPW Edition 12 as noted.

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/scd

5124 Comment

Document Element: SP7 – AFFORDABLE HOUSING PROVISION
Respondent: Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]

Summary:

The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).

Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.

The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.
Without prejudice to the Minster's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.
National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.
After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:
Annex 1 – General Conformity with Future Wales
• No significant concerns
Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)
• Spatial Strategy and Primary Settlements
• Housing and Economic Growth Levels – Regional Collaboration
• Maximising Affordable Housing Provision
• Delivery & Implementation – General
• Gypsy and Travellers
• Renewable Energy
• Minerals
• Best and Most Versatile Agricultural Land (BMV)
• Welsh Language

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.
My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.
Yours sincerely,
Neil Hemington
Chief Planner Welsh Government

Annex 1 - Statement of General Conformity
The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).
There is a joint position statement on the relationship between Bridgend, Cardiff and the Vale of Glamorgan (BP20A), which considers population growth, migration patterns, housing completions, employment characteristics, demographics, commuting and transport links between the three adjoining authorities. The Welsh Government supports

the principle of this work which demonstrates how change in the Vale of Glamorgan relates and complements growth in adjoining local authorities. This approach illustrates a good mechanism for other local authorities to follow.
Reasons
Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the climate change and biodiversity emergencies, making the best use of resources.
Policy 1 and Policy 33 of Future Wales states that Cardiff, Newport, and the Valleys will be the main focus for growth and investment in the region. The strategic diagram (p163) also identifies the Vale of Glamorgan within the National Growth Area. The Vale of Glamorgan RLDP, specifically BP20A, provides robust evidence on the interrelationship and key issues with adjoining authorities, including their interaction and how they have shaped and influenced the scale/location of growth in the RLDP. This is set out in the three Joint Position Statements (JPSs).
BP45 'Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR), May 2024, provides further evidence on how the scale of growth indicated for the region has shaped the scale of future economic growth within the Vale of Glamorgan. This results in a higher level of employment growth in the Vale of Glamorgan primarily to increase self-containment and reduce out-flows to adjoining urban areas. Two key areas for future economic growth are identified at Cardiff Airport/Bro Tathan Enterprise Zone and Aberthaw Power Station.
The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.
On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):
Policy 1: Where will Wales grow
Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 6: Town Centre First
Policy 10: International Connectivity – Cardiff Airport
Policy 12 Regional Connectivity
Policy 33: National Growth Area – Cardiff, Newport and the Valleys
Policy 36: South-East Metro
Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.
With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.
The Level of Growth - Homes and Jobs
The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).

Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.
BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.
Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.
The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level of growth proposed in the plan.
We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.
The Welsh Government notes that BP0A identifies small and large windfalls, based on historic trends of 53/yr and 80/yr respectively. Also, the large windfalls are not included in the first two years of the trajectory, as per the DPM. A non-delivery allowance of 5% is identified, which reflects local characteristics in the Vale of Glamorgan. A flexibility allowance of 9.8% has been factored into the provision. The Welsh Government supports this approach, although whilst Appendix 1 contains a housing trajectory, there is no table to mirror that of Table 21, DPM. This should be included in Appendix 1. 6

Jobs: The Council's 10-year dwelling-led growth option results in a requirement for 4,875 new jobs (325 p/a) over the plan period. This broadly aligns with the projected growth for 5,338 (355 p/a) new jobs in the Employment Land Review (BP12) and as set out in Policy SP14.
The level of employment growth proposed (5,338 jobs) over the plan period is below the target in the currently adopted plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.
In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of homes and jobs proposed in the plan, which is in general conformity with Future Wales.
Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13

Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.
The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.
Paragraph 6.137 of the plan states:
"Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary."
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?
Affordable Housing Exceptions Sites
Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.
Employment Land
The Council's Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).
Delivery and Implementation
PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.
The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.
The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have 'rolled over' from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.
The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters.
It will be for the Council to justify deliverability supported by robust financial viability.
Gypsy and Travellers
The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are 'immediate' by 2026. WG note that 4 pitches have since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

Policy SP9 identifies a site at Llangan (0.76Ha) to accommodate the 7 pitches needed. It will be for the Council to demonstrate the appropriate site selection assessment process has been followed and that the site complies with requirements in PPW (4.2.35), Circular 005/2018 (paragraph 35) any relevant guidance and the DPM (5.80-5.85) to allocate a deliverable site in the plan period. The views of the relevant statutory bodies must also be agreed with no outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.
Renewable Energy
Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable

Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Could the Council provide an update on alternative options for a DHN in Barry?
It is welcome that the Renewable Energy Assessment (REA) has considered BMV policy, specifically for solar PV, and use of the Predictive ALC Map. The assessment has only considered non-BMV land (Subgrade 3b, Grade 4 and 5). The assessment would benefit from referencing the clarification provided in the DCPO letter of 1st March 2022 in respect of solar PV and BMV agricultural land for completeness.
The study identifies that in the Vale of Glamorgan solar development is more suitable than wind energy because of the flight path of aircraft in the south of the County Borough. However, there are some opportunities for wind sites, but these are likely to be small (<10MW) where aviation risks are lower and there is some grid access. Conversely, there are large expanses of land suitable for solar areas (>10MW) to the West of the County Borough, where there is little existing development. The study identifies 20 large-scale solar areas but recognises that grid constraints may impact the ability of sites to come forward.
Solar and wind search areas (where appropriate) below the 10MW Developments of National Significance (DNS) have been identified (Policy CC3). The plan also includes a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW (Policy CC4). Policy CC3 makes reference to adhering to the criteria in Policy CC4. However, would it not be the case that if search areas have been identified in Policy CC3 have they not already met the criteria? If they would not, should they be identified in the first place? Clarity would be beneficial. The Welsh Government supports the approach but seeks clarity on the point raised.
The Welsh Government notes the proposed search areas for wind energy near Morfa Ystrad Owen/Nant Rhydhalog, according to the Peatlands of Wales Evidence Score Map, the search area includes areas of peatland (Evidence Score 4). The site is also a SINC. This raises concerns as to how the inclusion of this search areas meets the policy test in PPW 6.4.15, 1a and 1b (Stepwise) regarding avoidance of irreplaceable peatland habitats and PPW 6.4.34.
Policy CC4 refers to Developments of National Significance (DNS) in 6.344 and 6.346. This should now refer to Strategic Infrastructure Projects (SIP) which replaced DNS.
Minerals
The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in the Vale of Glamorgan. The Welsh Government policy clarification letter (dated 11 November 2021) identifies a surplus of 1.68mt of crushed rock. As there is a surplus of crushed rock reserves and a lack of sand and gravel production in the Vale, no specific allocations are required in the replacement plan. It is unclear whether a Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region been agreed, or does the latest Position Statement (July 2022) explain how any shortfall will be met across 9

the region, particularly for crushed rock, of which the Vale has a surplus? Clarification would be beneficial.
BMV Agricultural Land
The Welsh Government has engaged with the Council for land quality advice, survey advice and ALC survey validation for candidate sites. The LPA has produced a specific topic paper on BMV policy application. BP23A. The Deposit RLDP allocates 188 hectares of housing land, 5.62 ha is identified as BMV land (under 3% of total housing allocations). The RLDP:
• Has sought to avoid BMV land wherever possible;
• Uses the Predictive ALC Map as a core evidence layer to inform: The spatial strategy;
• Settlement hierarchy decisions; and
• Candidate site assessments.
•
• Directs strategic growth to areas with least BMV land
• Removes or avoids allocations where BMV impacts were significant or unjustified.
• Quantifies total BMV loss and demonstrates it is minimal (5.62ha) and proportionate at plan level.
• Applies a sequential approach through: Preference for brownfield and non-BMV sites;
• Replacement of higher-BMV sites with lower-grade alternatives where possible.
•
• Requires site-specific ALC surveys to verify actual land quality before allocation.
• Demonstrates that allocated BMV land is: Often small, fragmented, or constrained;
• Sometimes previously disturbed or incapable of being farmed differently from surrounding lower-grade land; and
• Necessary to deliver the Plan's housing strategy where reasonable alternatives are unavailable.
•

In conclusion, the Welsh Government consider the Authority has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy, and on that basis no objection is offered.
Green Infrastructure
Policy SP19 should explicitly reference the need for development to be accompanied by a Green Infrastructure Statement.
PPW12 requires decision makers to apply the step wise approach to GI, with enhancement secured at every stage where possible, there is no distinction made between the quality of the GI assets – the qualification in the policy statement that states proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure should be redrafted to remove the quality reference. The need to avoid an impact in the first instance should also be explicitly incorporated into the policy.
Criterion 1 (Policy SP20) should be redrafted – the stepwise approach in PPW 12 6.4.15 1a - does not distinguish between relative ecological value – the avoidance step applies to biodiversity in its widest sense (i.e. the variety of

species and habitats and their abundance) and ecosystem functioning.
Welsh Language
There is limited reference to the Welsh language in the plan, either potential adverse impacts arising through development, or mechanisms via a policy framework to support and grow the use of the language. There are references to a number of Welsh-medium schools (3.26) and the increase in the number of people able to speak Welsh according to the 2011 census (3.52) but there is no mention of the authority's Welsh Language Strategy or promoting or cross-referencing to the aims of 10

Cymraeg 2050: A million Welsh-speakers. Paragraph 6.81 of the plan refers to development north west of Barry:
“Land at North West Barry is allocated for a residential development of up to 376 dwellings and public open space. The site is in a sustainable location on the edge of the Barry, a key settlement, in a location that is well served by services and facilities, including a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium and Church in Wales) and two high schools (English and Welsh Medium) all located in reasonable walking distance. There is an active travel route along Port Road West, bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry. Barry station is 1.3 miles from the site entrance.”
There is no mention that the Council want to undertake a Welsh Language Impact Assessment (WLIA) so there appears no attempt to measure the impact on the Welsh schools resulting from housing development? Could the Council clarify if such implications have already been covered in the WLIA for the plan, ISA, or are any specific policies necessary?

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/syf

5949 Object

Document Element: SP7 – AFFORDABLE HOUSING PROVISION

Respondent: HBF (Mr Mark Harris) [538]

Summary:

The words 'including a minimum of 3,070 affordable homes' should be changed to ' a target of 3,070 affordable homes'. The reason for this is that a minimum suggests it should be more; however, other relevant housing policies are worded to provide for a defined number or target and do not provide for more to be delivered. This change of wording does not stop more affordable homes from being provided, should developers choose to do so.

Additional wording should be included at the end of the policy:
'The mix of affordable housing will also take into account the character of the site and its surroundings to ensure the development creates a sustainable community in line with placemaking principles.'

Full text:

The words 'including a minimum of 3,070 affordable homes' should be changed to ' a target of 3,070 affordable homes'. The reason for this is that a minimum suggests it should be more; however, other relevant housing policies are worded to provide for a defined number or target and do not provide for more to be delivered. This change of wording does not stop more affordable homes from being provided, should developers choose to do so.

Additional wording should be included at the end of the policy:

'The mix of affordable housing will also take into account the character of the site and its surroundings to ensure the development creates a sustainable community in line with placemaking principles.'

Change suggested by respondent:

Amend the wording of the policy accordingly in line with the above comments.

Sound: Yes

Attachments: None

6029 Object

Document Element: SP7 – AFFORDABLE HOUSING PROVISION

Respondent: Barratt Redrow Homes [2669]

Agent: Lichfields

Summary:

Policy SP7 of the RLDP requires a mix of affordable housing based on evidence, targeting 3,070 dwellings, but lacks flexibility for site-specific viability. Paragraph 6.120 acknowledges that viability may affect delivery, yet this is not reflected in SP7. A uniform percentage approach may overlook technical complexities, contrasting with PPW guidance to consider site viability. Policy SP8 introduces flexibility, allowing site-by-site negotiation and independent viability assessment, and considers up-to-date housing needs. However, SP7 and SP8 conflict: SP7 mandates a rigid mix based solely on evidence, while SP8 permits adjustments, raising concerns for affordable-led schemes with significant planning obligations.

Full text:

Policy SP7 stipulates that in order to meet the affordable housing target of 3,070 dwellings during the RLDP period “a mix of affordable housing will be required, informed by the Local Housing Market Assessment LHMA, waiting list data and the Older Persons Housing Strategy. This should include a range of tenures, types and sizes of homes, as well as an appropriate balance of general needs and specialist accommodation”.

Whilst it is understood that it is a core RLDP objective to deliver affordable homes in VoG which respond to identified need, Policy SP7 must allow for viability to be considered. Whilst paragraph 6.120 of the RLDP states “In calculating the affordable housing target, the Council recognises that the number of affordable homes delivered during the plan period could be lower as a result of site viability constraints or greater where they are on sites delivered by the Council, Registered Social Landlords or on land owned by the Welsh Government”, this recognition is not transferred into the wording of Policy SP7.

The blanket approach to affordable housing requirement percentage across VoG fails to take into account that there may be unique technical complexities at individual allocations that are required to be overcome before sites can be delivered. This is in contrast to PPW paragraph 4.2.32 which states that: “When setting the affordable housing thresholds and/or site-specific targets planning authorities must consider their impact on site viability to ensure residential sites remain deliverable.”

Policy SP8 sets out that Primary and Minor Rural Settlements should meet an affordable housing requirement level of 40%. We do query why affordable housing led allocations in the same geographic areas have a requirement of 50% affordable housing? It is understood from paragraphs 6.122-6.123 of the RLDP that the affordable housing percentage requirements for the settlements in VoG are being carried over from the adopted LDP. However, this does not explain why windfall sites in the Primary and Minor Rural Settlements outside of the Strategic Growth Area would need to provide a minimum 40% affordable housing and the Affordable Housing Led Schemes in the Primary and Minor Rural Settlements outside of the Strategic Growth Area would need to provide a minimum of 50%. Further evidence is required on this matter to ensure that Policy SP8 meets the second test of soundness (Is the Plan appropriate?).

Policy SP8 also states that: “The provision of affordable housing will be negotiated on a site-by-site basis considering the evidenced viability of the development.” Policy SP8 also states: “Where developers claim that the target is unviable, a detailed viability assessment must be submitted and independently reviewed.” The consideration of viability in Policy SP8 is endorsed as it is consistent with paragraph 4.2.32 of PPW.

Policy SP8 also states that: “The exact mix of affordable housing required will be considered on a case-by-case basis having regard to the Council’s latest needs evidence at the
time of the application”. Again, this level of flexibility is endorsed. However, we are concerned that there is contradiction between Policy SP7 (Affordable Housing) and Policy SP8 that needs to be addressed. As drafted Policy SP8 (which relates to all new residential developments in VoG including Affordable housing led allocations) allows flexibility for the delivery of mix of affordable homes as it allows for the exact mix to be considered on a case-by-case basis having regard to the Council’s latest evidence needs. Yet, Policy SP7 (which relates to all affordable residential units to be delivered in the RLDP period) applies a blanket approach that requires the mix of affordable housing to be informed by the Council’s evidence base only, with no flexibility or consideration for site-specific cases or viability. Thus, the two policies as drafted in the RLDP currently contradict one another. This is especially important for the affordable led schemes as the housing mix (affordable and market) can have a big impact on the viability of the scheme given that they have more onerous planning obligations.

Change suggested by respondent:

On the basis of the above, it is proposed that Policy SP7 and Policy SP8 should be aligned so that they are consistent with each other and provide flexibility on a “case-by-case basis”. This would ensure that the RLDP will meet the third test of soundness (Will the Plan deliver?).

Sound: No

Attachments: None

6073 Object

Document Element: SP7 – AFFORDABLE HOUSING PROVISION
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:

Policy SP7 aims to deliver 3,070 affordable homes during the RLDP period, requiring a mix informed by the Council's evidence. Policy SP7 does not allow flexibility and viability considerations which are essential, especially given the Council's ambitious policies for net zero homes. Policy SP8 endorses site-specific negotiations and viability assessments, allowing flexibility in affordable housing mix. Thus, SP7 and SP8 as drafted currently contradict one another. This is especially important for the affordable led schemes as the housing mix (affordable and market) can have a big impact on the viability of schemes given that they have more onerous planning obligations.

Full text:

Policy SP7 stipulates that in order to meet the affordable housing target of 3,070 dwellings during the RLDP period "a mix of affordable housing will be required, informed by the Local Housing Market Assessment LHMA, waiting list data and the Older Persons Housing Strategy. This should include a range of tenures, types and sizes of homes, as well as an appropriate balance of general needs and specialist accommodation".

Whilst it is understood that it is a core RLDP objective to deliver affordable homes in VoG which respond to identified need, Policy SP7 must allow for viability to be considered. There is a lack of clarity around the term 'informed'. It is unclear whether the Council will require the mix reflect the LHMA etc or whether it is just a starting point for negotiation. It is assumed that it is just a starting point but this could helpfully be clarified.

It is noted that the Council has ambitious policies for both affordable housing and net zero operational homes. In working towards delivery of these it will be necessary to carefully consider site viability and there must be some flexibility in both Policy SP7 to ensure that necessary new homes are built.

PPW paragraph 4.2.32 states that: ""When setting the affordable housing thresholds and/or site-specific targets planning authorities must consider their impact on site viability to ensure residential sites remain deliverable."

Policy SP8 also states that: "The provision of affordable housing will be negotiated on a site-by-site basis considering the evidenced viability of the development." Policy SP8 also states: "Where developers claim that the target is unviable, a detailed viability assessment must be submitted and independently reviewed." The consideration of viability in Policy SP8 is endorsed as it is consistent with paragraph 4.2.32 of PPW.

Policy SP8 also states that: "The exact mix of affordable housing required will be considered on a case-by-case basis having regard to the Council's latest needs evidence at the time of the application". Again, this level of flexibility is endorsed. However, we are concerned that there is possible contradiction between Policy SP7 (Affordable Housing) and Policy SP8 that needs to be addressed. As drafted Policy SP8 (which relates to all new residential developments in VoG including Affordable housing led allocations) allows flexibility for the delivery of mix of affordable homes as it allows for the exact mix to be considered on a case-by-case basis having regard to the Council's latest evidence needs. Yet, Policy SP7 (which relates to all affordable residential units to be delivered in the RLDP period) requires the mix of affordable housing to be informed by the Council's evidence base only, it is unclear the extent to which there is no flexibility or consideration for site-specific cases or viability. Thus, the two policies as drafted in the RLDP currently contradict one another. This is especially important for the affordable led schemes as the housing mix (affordable and market) can have a big impact on the viability of the scheme given that they have more onerous planning obligations.

Change suggested by respondent:

On the basis of the above, it is proposed that Policy SP7 and Policy SP8 should be aligned so that they are consistent with each other and provide flexibility on a "case-by-case basis". This would ensure that the RLDP will meet the third test of soundness (Will the Plan deliver?).

Sound: No
Attachments: None

6782 Comment

Document Element: SP7 – AFFORDABLE HOUSING PROVISION
Respondent: Persimmon Homes (East Wales) [1068]
Agent: Boyer Planning

Summary:

In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.

As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.

National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking.

The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):

- Test 1 – Does the Plan Fit?
- Test 2 – Is the Plan Appropriate?
- Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population

and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on

an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.
Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.
In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public

transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential

slippage elsewhere to ensure the plan is effective in meeting local need.
More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.
Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual
As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement
From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified

"has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area." It also notes that this level of growth has been chosen so that it is "complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).".
Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.
In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.
Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.
Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.
Policy SSC1 – Development within Settlement Boundaries
Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.
Policy SP4 – Placemaking
In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.
In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car.
Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.
The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape

setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.
Policy PGD1 – Creating Well Designed and Inclusive Places
Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.
On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both

local and national planning policy objectives.
The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
Loss of Allocated Employment Land
Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
Policy HG3 – Housing Led Redevelopment Opportunity
Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
Policy SP7 – Affordable Housing Provision
In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.

National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.

To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.

Policy SP8 – Affordable Housing Requirements

Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.

On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.

Policy SP10 – Sustainable Transport

Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.

In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.

In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.

Policy TR1 – Transport Proposals

Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.

In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.

Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.

Policy SP13 – Community Infrastructure and Planning Obligations

Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.

Policy CI1 – Open Space Provision
Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.
The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.
Productive and Enterprising Places
Policy CC1 – Residential Operational Net Zero Carbon Development
Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.
Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.
The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.
Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.
Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.
Distinctive and Natural Places
Policy SP19 – Green Infrastructure
In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.
The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.
Policy SP20 – Biodiversity and Ecosystem Resilience

In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Policy DNP1 – Special Landscape Areas

Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.

Policy DNP2 – Green Wedges

Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.

Policy DNP8 – Severn Estuary Recreational Pressure

Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.

The policy also provides no clear threshold or criteria for determining what level of activity would constitute “visitor pressure” or an “adverse impact” on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.

From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan’s ability to meet its housing requirements and risk finding the RLDP unsound.

Conclusion

Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes’ most pertinent comments on the consultation document are summarised below:

• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.

• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale’s position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan’s ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government’s Future Homes Standard (FHS), which is intended to ensure all new homes are “zero-carbon ready” through a consistent national Building Regulations framework.

• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/38r

6915 Comment

Document Element: SP7 – AFFORDABLE HOUSING PROVISION

Respondent: Barratt Redrow Homes [2669]

Agent: Boyer Planning

Summary:

In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.

Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.

Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following: 'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'.

Full text:

1. INTRODUCTION
1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.
1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:
• Section 3 – The Vale of Glamorgan Key Characteristics;
• Section 4 – RLDP Key Themes, Vision, and Objectives;
• Section 5 – Sustainable Growth Strategy; and
• Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.
1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?

• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS
Settlement Pattern
2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.
2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Need
2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
3. RLDP KEY THEMES, VISION, AND OBJECTIVES
3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.
Key Themes
3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking

3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY
Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and

distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring

authority.
5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
5.10 For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
5.11 More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
5.12 Whilst Barratt Redrow appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range, having reviewed the Deposit Plan evidence base Barratt Redrow believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
5.13 In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
5.14 Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
5.15 In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
5.16 In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need. Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion

of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036) and therefore is made up of

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual
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sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.
5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.
5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.
5.27 In summary, Barratt Redrow acknowledge the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
5.28 These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance and additional site allocations, such as Swn Y Coed, Wenvoe, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
5.29 Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.
5.30 Accordingly, despite Wenvoe being identified as a primary settlement, Policy SP2 notes that development in this location will be limited to 'the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.' Similarly, it is noted that Policy SP2 does not consider Wenvoe to be an appropriate location for ''substantial additional growth''.
5.31 Barratt Redrow object to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently

sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified.
5.32 First of all, the Deposit Plan acknowledges that it performs a similar function to the Primary Settlements located within the Strategic Growth Area and it is described as one of the 'sustainable communities' in The Vale of Glamorgan Key Characteristics section, as noted previously in Section 3.
5.33 Likewise, the site benefits from excellent accessibility the local public transport network, active travel routes and local services. These characteristics fully accord with Welsh Government's strategic objectives and emphasise the fact that Swn Y Coed constitutes an appropriate location for future housing.
5.34 With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge''. Barratt Redrow do not consider this to be sufficient justification to discount the site from allocation as there would be limited impact on BMW agricultural land arising from the development of Swn Y Coed.

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available.
5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.
Policy SP4 - Placemaking
5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.
5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.
5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.
5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.
5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
Policy PGD1 – Creating Well Designed and Inclusive Places
5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the

regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on

private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
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• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.
• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.
• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.
• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.
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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
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• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council

through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply
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• HG1 (8) St Athan - Clive Road, St Athan

Policy HG3 – Housing Led Redevelopment Opportunity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).
• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated

with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4).Finally, the Council's own Viability Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.
• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.
• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:
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Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:
i. Space heating demand less than or equal to 40kWh/m2/year;
ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.
• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an

approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
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Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established 'defensible' limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be 'largely shielded from view by woodland blocks/strips'.
• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for 'infilling' the site. Proposed development should seek to reflect the low density, height and well-treed character of

Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.
• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
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Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute “visitor pressure” or an “adverse impact” on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan’s ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
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Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.
• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:

• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
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MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
•
• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
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Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
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CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the Council's vision for the VoG.
• 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
• 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
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6. CONCLUSION
• Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.

• Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swn Y Coed, are necessary to ensure the RLDP is able to effectively meet
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Barratt Redrow welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Barratt Redrow support the requirements for affordable housing in new development. In its current form the proposed policies SP7 and SP8 lack sufficient flexibility for site specific circumstances and physical constraints which may impact upon delivery. This inevitably creates uncertainty for a number of sites, where the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities.
• From a planning perspective it is also important to recognise the additional benefits the site (Candidate Site Ref No. 437) could provide in accommodating the increased housing need generated by the suggested 15% flexibility allowance within a highly sustainable location. The principles of which clearly align with the Council's aspirations and would maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport

Change suggested by respondent:

Policy SP7 should include a note similar to the following:
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'.

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3ch

7037 Object

Document Element: SP7 – AFFORDABLE HOUSING PROVISION
Respondent: Marion morgan [2413]
Agent: Geraint John Planning Ltd

Summary:

Without a suitable supply of affordable housing delivered over the Plan period, trends that result in an extremely unbalanced demographic will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and

3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ystradowen area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:
VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of

further sites within the Minor Rural Settlements, such as Ystradowen. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months
• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be

delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:
Table 6: Existing LDP allocations to be carried forward

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.
Extract of Housing Trajectory (annotated by GJP - red dotted line)

It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.
Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.
HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.
Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.
It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land at Ystradowen (Site ID: 430 / 4060) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) and Annex 2 for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 230 affordable homes in the Cowbridge housing market area / ward - which Ystradowen is located within. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation – see Annex 2.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ystradowen and the proposed site. As outlined within these representations, it is considered that the site (ID

430) represents a sustainable, deliverable and acceptable site. The site is located within 2.7 miles Cowbridge and 2.8 miles of Pontyclun. Due to the availability of frequent bus services, and active travel links, key services are readily available to access for any residents within Ystradowen without the need to travel by car. The site is within a maximum 9- and 14-minute bus journey (respectively) of the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Accordingly, the settlement of Ystradowen represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ystradowen, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.
As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 "For the purposes of this policy, 'small-scale' will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."
The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.
SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

Deliverability of the Site

In summary, the site seeks to deliver the following key elements:

• Provision of circa 67 new-build residential dwellings (including 50% affordable housing provision);
• A mix of house-types and tenures across the site to cater for a variety of needs;
• Creation of a new primary access into the site;
• Connection to pedestrian links within the wider area;
• Public open space; and
• Green Infrastructure; and
SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

Land at Ystradowen (Site ID: 4060)

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site. The 'Candidate Sites Assessment Deposit Plan Stage v2' for 'Land at Ystradowen (Site ID: 4060)' sets out that the position of the site at the Deposit Stage is as follows:

"Amendment of proposed use from housing to affordable housing led. Previous site reference 430. The original assessment concluded that whilst the site was adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.
The LDP site in question has subsequently been granted planning permission for housing. This site will serve the future needs of residents in the area and it is not considered that additional land should be allocated in this location."

In terms of the first paragraph, the assessment/conclusion implies and suggests that 'Land at Ystradowen' (4060)' does not adjoin the existing LDP settlement boundary as the allocated site ('Land off Sandy Lane, Ystradowen') has not been built out – "by virtue of an existing adopted plan LDP allocation this is currently under review". Detailed representations have been made and submitted previously at the Housing Trajectory (see Appendix B& C) that outlines that this is fundamentally incorrect. This is not repeated in full here, with just the main points re-iterated.

First and foremost, 'Land at Ystradowen (4060)' directly adjoins the existing LDP settlement boundary. Secondly, there has been a significant change in the position and circumstances. The allocated site ('Land off Sandy Lane, Ystradowen') is currently being "built out", with work commencing on site (see photographic evidence in Appendix C)
- post the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024).
Accordingly, the site no longer adjoins "the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review". Given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.

With regards to the second paragraph, the assessment/conclusion outlines that "The LDP site … will serve the future needs of residents in the area and it is not considered that additional land should be allocated in this location". The arguments and case presented in Appendix B & C. There is a clear overreliance on 'rolled forward' sites / existing allocated sites. A total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%). We believe that a greater level of growth is achievable and should be considered. Not least as there is an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings). As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the

Plan's strategy. Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply. The "future needs of residents in the area" will therefore not be met/served by just this site, and it is considered that additional land should be allocated in this location.

Furthermore, to reinforce, illustrate, and evidence the point in specific reference to the site the subject to this representation (located in Ystradowen), reference is made to application ref. 2013/00856/OUT – 'Land off Badgers Brook Rise, Ystradowen'. The Final Report of the application states that "Ystradowen is considered a sustainable settlement for further housing development" – i.e. "additional land should be allocated in this location".

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan (see Appendix B), a similar 'scoring' exercise has been undertaken as part evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage can be seen below for reference:
BP18 Candidate Ste Assessment at Preferred Strategy Stage
As demonstrated above, there has been a positive change to the scoring attributed to the site ('Land at Ystradowen'). The change is a positive change to the 'Infrastructure Availability' section changing from: 'Grey' (no score) to 'Amber'. Infrastructure Availability is outlined as: "Existing or proposed services would be suitable subject to local improvements without impacting on development viability and/or delivery timescales" (see below):
The explanation for the scoring provided by the Vale sets out that "Sites will be assessed against the availability of water connections to the site, in addition to the method of foul sewage disposal from the site. Consultation shall be undertaken with DCWW to determine whether there is sufficient capacity to the wastewater treatments works, and how it links into DCWW's Capital Investment Programme.
Where consultation indicates limited capacity, or the site is located away from a viable connection this may impact on the deliverability/viability of a site should this require significant connection costs or upgrades. Consequently, the Council shall require site proposers to undertake detailed site viability assessment to determine the impact that additional cost shall have on development cost and deliverability timescales."

As set out above, this is a positive change. This is most likely derived from the allocated site ('Land off Sandy Lane, Ystradowen') currently being "built out", with work commencing on site that would facilitate and improve the 'Infrastructure Availability'. This re-iterates the point made previously re the incorrect assessment reached, and the ever changing position of this site – which will only improve given the neighbouring allocated site ('Land off Sandy Lane, Ystradowen') being "built out".

Land West of Maendy Road, Aberthin (Site ID: 2299)

There are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and the site the subject of these representations. It is therefore considered pertinent to assess and compare the suitability of 'Land West of Maendy Road, Aberthin'. Not least as 'Land at Ystradowen (Site ID: 4060)' is for a "small-scale affordable housing led development in a minor rural settlement", within "the ward of Cowbridge".

The site 'Land West of Maendy Road (Site ID: 2299)' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however from our review of the evidence base submitted as part of the Housing Trajectory consultation, there was no assessment and critique of this site at this stage. This raises questions regarding the "soundness" of this site, given it appears this sites acceptability and inclusion was pre-determined.

The site ('Land West of Maendy Road') has since had a detailed assessment and critique published, however concerns still remain regarding the "soundness" of the site which forms part of the intended housing land supply. The 'Stage 2 Detailed Site Assessment' summary undertaken for 'Land West of Maendy Road' has been extracted below:

"The site is proposed for a small-scale affordable housing led development in a minor rural settlement, which would accord in principle with the strategy. Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent.
The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that."

As mentioned previously, there are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)' (the subject of these representations). Firstly 'Land at Ystradowen (Site ID: 4060)' is also for a "small-scale affordable housing led development", that is "in a minor rural settlement" (Ystradowen). Accordingly, it should follow that as 'Land West of Maendy Road, Aberthin (Site ID: 2299)' "would accord in principle with the strategy", 'Land at Ystradowen (Site ID: 4060)' would also "accord in principle with the strategy".

Furthermore, there is no material difference between the following assessment of Aberthin and Ystradowen:

"Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary

school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent."

There is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms.

As set out in our representations to the Preferred Strategy, we reviewed the key services in proximity to the site. The following services were identified as part of that review:

• In terms of public transport, there are two bus stops located approximately 0.2 miles (4-minute walk) from the site ('Land West of Maendy Road'), with the 321 providing services between Llantwit Major and Talbot Green;

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin;

• The site is also located 0.2 miles (4-minute walk) from The Farmers Arms Pub and 0.2 miles (4-minute walk) from The Hare and Hounds Inn; and

• The site is located 0.2 miles (5-minute walk) from Aberthin Village Hall.

Given the above, "The settlement (Ystradowen) is also served by public transport".
Furthermore, Ystradowen is located only 2.7 miles from Cowbridge (9-minute bus journey). The "primary and secondary school provision with the wider range of services and facilities in Cowbridge" mentioned in relation to Aberthin are therefore also in close proximity to Ystradowen.

Given the above, any candidate site at 'Land at Ystradowen' (the subject of these representations – Site ID: 430 / 4060) is no less sustainable than the site at Aberthin (Site ID: 2299).

Not least as the following additional key services are located within Ystradowen and therefore in close proximity to the promoted site:

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'; and
• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Furthermore it is important to note that the above scoring criteria is very limiting, and does not take into account the important role and proximity of settlements in a wider context. For example, it does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant) – see Appendix B for full details.

In addition, as set out within the representations made in relation to the House Trajectory (Appendix C), the following extracts have been taken from the Officer's Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:
As set out above, it is important to note that the Final Report of application ref. 2013/00856/OUT states that "Ystradowen is considered a sustainable settlement for further housing development", due to "the sustainable nature of the settlement". Furthermore, the Final Report of app ref. 2023/00948/FUL states:

• "Notwithstanding this, the site is located in close proximity to local services and there is a bus stop located nearby. Whilst the comments relating to the reliance and frequency of the bus services have been considered, there still remains a bus service in the area"; and
• "Firstly, as aforementioned, many neighbouring comments refer to the site as unsustainable and have commented on the suitability of public transport and cycle routes etc. This has been addressed above."

The above clearly evidences that the location has previously been endorsed as, and is currently still found to be, sustainable.

Accordingly, it can be considered therefore that if the proposed allocated site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen (Site ID: 430 / 4060)' is equally suitable to be an Affordable Housing Led Allocation.

The second section/paragraph of the assessment states:

"The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that."

'Land at Ystradowen (Site ID: 4060)' is also located within "the ward of Cowbridge". As per the above and outlined by the Authority, there is "a need for 230 additional affordable units over the next 15 years". It is clear therefore that there is a need for additional affordable units in this ward, and this site would therefore also help to alleviate this need.

This position is a direct contradiction of course of the assessment/conclusion for 'Land at Ystradowen (Site ID: 4060)' which stated "it is not considered that additional land should be allocated in this location". It is clear from the above however that "additional land should be allocated in this location" to satisfy this "need for 230 additional affordable units over the next 15 years" – which 'Land at Ystradowen (Site ID: 4060)' can do. This is not least the case given the detailed arguments, case and representations presented and evidenced previously above and in Appendix B & C.
To briefly reiterate there is a clear overreliance on 'rolled forward' sites / existing allocated sites which has resulted in the unmet need deriving from the existing LDP being still present. A greater level of provision for new allocations should therefore be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply, so these can "make an important contribution in meeting" the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" – which 'Land at Ystradowen (Site ID: 4060)' can do.

As set out within the representations made in relation to the housing trajectory (see Appendix C), a further key consideration to note and one which does differentiate between the relative merits of the 'Land at Maendy Road, Aberthin' and 'Land at Ystradowen' is that the LDP Proposals Map demonstrates that 'Land West of Maendy Road' is within a Special Landscape Area - see below:
Vale of Glamorgan Proposals Map (Land West of Maendy Road outlined in red
Under Policy MG17 'Special Landscape Areas' it is considered that development in SLA could pose an "unacceptable harm to the important landscape of the area". Accordingly, this development and proposed allocation could therefore cause "unacceptable harm to the important landscape of the area".

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any "unacceptable harm to the important landscape of the area".
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)
It is noted that the detailed assessment scores the site 'amber' in respect to Special Landscape Area (refer to / see later section for full details), with the assessment methodology setting out that "the site is located within a Special Landscape Area/The Glamorgan Heritage Coast and the development may result in little or no change in character and little or no significant effect on landscape character and visual amenity."
A detailed assessment of the impact upon the SLA in respect to the development of 'Land West of Maendy Road, Aberthin' should therefore be, and will need to be, undertaken as part of any planning application. If it is found that the site causes "unacceptable harm to the important landscape of the area", this will lead to this proposed allocation being at risk of not being delivered. This will be as a result of its impacts and acceptability at the planning application stage that the landscape and visual impact of development of the site is unacceptable. As such, these proposed affordable units are at a potential considerable risk of being lost and not satisfying the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" – which 'Land at Ystradowen (Site ID: 4060)' can do as it is not located in an SLA.

In addition the draft housing trajectory set out that "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" is not provided for. This is clearly an issue. Given however 'Land at Ystradowen' does not sit within a SLA – and so not pose any potential concern or cause any "unacceptable harm to the important landscape of the area" – the allocation of this site would be more suitable and "safer" - as there would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for, and the need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" would be satisfied.

As mentioned previously, a detailed assessment and critique has now been undertaken of 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part evidence base for the Deposit Plan using the similar 'scoring' exercise. As such, it is again pertinent to consider and respond to the Council's 'scoring' exercise assessment of the site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part of these representations.

The 'Summary of Assessment of New Candidate Sites' table can be seen overleaf for reference:
BP18A Candidate Site Assessment at Deposit Plan Stage
A comparison between the site assessments undertaken for both 'Land West of Maendy Road, Aberthin (Site ID: 2299)' (on the left), and 'Land at Ystradowen (Site ID: 4060)' (on the right) has been undertaken, and can be seen below for reference:

Having undertaken a review of the scoring for both 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)', it is clear that 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)':

• 'Land at Ystradowen (Site ID: 4060)': 17/33 criteria are scored green = 52%

• 'Land West of Maendy Road, Aberthin (Site ID: 2299)': 12/34 criteria are scored green = 36%

It is clear therefore given the above that 'Land at Ystradowen (Site ID: 4060)' is a better site, and should be allocated accordingly.

One key example to note is how the criterion 'Access to Services and Facilities' has been scored. For 'Land at Ystradowen (Site ID: 4060)' this has been scored green, yet for 'Land West of Maendy Road, Aberthin (Site ID: 2299)', this has been scored red. Given this, this corroborates the position outlined previously above that, if the proposed allocated site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen (Site ID: 430 / 4060)' is equally as sustainable – in fact considered more suitable (given its higher scoring in this respect).

Furthermore, we question the "soundness" of the assessment of 'Land West of Maendy Road, Aberthin (Site ID: 2299)', given that 7/34 (21%) of the criteria do not appears to have not been assessed – i.e. 7/34 (21%) of the criteria are scored grey. This raises questions regarding the "soundness" of this site, given it appears this sites acceptability and inclusion was pre-determined.

It is clear therefore that if 'Land West of Maendy Road, Aberthin (Site ID: 2299)' has been deemed acceptable for allocation, yet 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than this site, 'Land at Ystradowen (Site ID: 4060)' should also be deemed acceptable and be allocated. Not least as the site is "proposed for a small-scale affordable housing led development in a minor rural settlement … would accord in principle with the strategy", and "could make an important contribution in meeting "a "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge".

Summary and Conclusion

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Deposit Plan published as part of the consultation.

In terms of SECTION 4, and a response to the Candidate Site Assessment at Deposit Plan Stage, the following key points have been made:

• The Council's 'Stage 2 Detailed Site Assessment' justification for 'Land at Ystradowen (Site ID: 4060)' is fundamentally incorrect;

• Given the material positive similarities between 'Land at Ystradowen (Site ID: 4060)' and 'Land West of Maendy Road, Aberthin (Site ID: 2299)', which has been deemed acceptable and allocated, 'Land at Ystradowen (Site ID: 4060)' should also be deemed acceptable and allocated accordingly;

• 'Land at Ystradowen (Site ID: 4060)' would help to alleviate and satisfy "a need for 230 additional affordable units over the next 15 years" within "the ward of Cowbridge"; and
• 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)', and so should also be deemed acceptable and be allocated;

Ultimately, 'Land at Ystradowen (Site ID: 4060)' is "proposed for a small-scale affordable housing led development in a minor rural settlement", and as such "would accord in principle with the strategy". It would therefore "make an important contribution in meeting" the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge".

We would therefore object the Council's assessment that the site is not considered suitable for development.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Credentials of this site subject to this submission; and
10. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing-led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the east of Coliwinston, Colwinston.

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major

applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicted in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.
Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.
The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.
Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest

number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.
Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:
Table 6: Existing LDP allocations to be carried forward
The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled

forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.
Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now

further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision.
Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".
As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision, and as such, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations

Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
Candidate Site Stage 2 Assessment (Site Ref. 404)
The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:
"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clearly evident deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site

allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Despite the absence of site-specific assessment criteria, as the RLDP preferred strategy states a key objective guiding site selection is that the Plan will "provide for vital and vibrant rural communities whilst protecting the countryside through the delivery of growth in sustainable locations related to the settlement hierarchy alongside the provision of supporting infrastructure" (Objective 7 'Fostering Diverse Vibrant and Connected Communities'), it is reasonable to assume that the Council considers 'Land West of Maendy Road' to be a 'sustainable' location.

Given this, we have reviewed the key services in proximity to the site. The following services were identified:

• In terms of public transport, there are two bus stops located approximately 0.2 miles (4-minute walk) from the site ('Land West of Maendy Road'), with the 321 providing services between Llantwit Major and Talbot Green.

• The site is also located 0.2 miles (4-minute walk) from The Farmers Arms Pub and 0.2 miles (4-minute walk) from The Hare and Hounds Inn.

• The site is located 0.2 miles (5-minute walk) from Aberthin Village Hall.

Aberthin is in close proximity (1.2 miles/14-minute walk) to the key settlement of Cowbridge - which is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Considering this, there is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms. Given that Ystradowen is located only 2.7 miles from Cowbridge (9- minute bus journey), the candidate site at 'Land at Ystradowen' is no less sustainable than the site at Aberthin. The following key services are within Ystradowen and therefore in close proximity to the promoted site:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin.
• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Accordingly, it can be considered therefore that if the proposed allocated site 'Land West of Maendy Road, Aberthin' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen' is equally suitable to be an Affordable Housing Led Allocation.
Furthermore, to reinforce the above position and to illustrate and evidence the site's sustainability, the following has been taken from the Officer's Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:
Reference is made in the Final Report of app ref. 2013/00856/OUT which states that "Ystradowen is considered a

sustainable settlement for further housing development", due to "the sustainable nature of the settlement".

Furthermore, the Final Report of app ref. 2023/00948/FUL states:

• "Notwithstanding this, the site is located in close proximity to local services and there is a bus stop located nearby. Whilst the comments relating to the reliance and frequency of the bus services have been considered, there still remains a bus service in the area."
• "Firstly, as aforementioned, many neighbouring comments refer to the site as unsustainable and have commented on the suitability of public transport and cycle routes etc. This has been addressed above."

The above clearly evidences that the location has previously been endorsed as, and is currently still found to be, sustainable.

A further key consideration to note and one which does differentiate between the relative merits of the 'Land at Maendy Road, Aberthin' and 'Land at Ystradowen' is that the LDP Proposals Map demonstrates that 'Land West of Maendy Road' is within a Special Landscape Area - see overleaf:
Vale of Glamorgan Proposals Map (Land West of Maendy Road outlined in red)
Under Policy MG17 'Special Landscape Areas' it is considered that development in SLA could pose an "unacceptable harm to the important landscape of the area". Accordingly, this development and proposed allocation could therefore cause "unacceptable harm to the important landscape of the area".

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any "unacceptable harm to the important landscape of the area".
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)

This is a significant factor to consider. 'Land West of Maendy Road, Aberthin' causing "unacceptable harm to the important landscape of the area" will lead to this proposed allocation being at risk of not being delivered by virtue of detailed assessments of its impacts and acceptability at planning application stage holding that the landscape and visual impact of development of the site is unacceptable. As such 25 affordable units will be lost from the proposed affordable 122 units, and ultimately being lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" is not provided for. This is clearly an issue. Given however 'Land at Ystradowen' does not sit within a SLA – and so not pose any potential concern or cause any "unacceptable harm to the important landscape of the area" – the allocation of this site would be more suitable and "safer" - as therefore would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.
Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)
As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:
Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social

inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:
In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Ystradowen', the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below. With reference to the above:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green.

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities.

Furthermore, the settlement of Ystradowen has been ranked highly in the VoG Sustainable Settlements Appraisal, scoring a total of 14 points according to the distance to key services and facilities available. This places Ystradowen 26th out of a total of 87 settlements. As a result, this would be deemed a suitable area to accommodate growth.

As stated above the key settlement of Cowbridge is located in close proximity being only 2.7 miles to the south and a 9-minute bus journey. Cowbridge is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Furthermore, it is important to note that the above criteria does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant). These areas comprise for example the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Given the above, 'Land at Ystradowen' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Ystradowen' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.
Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref. 2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.
Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Credentials of this site subject to this submission

There has been a significant change in the position and circumstances since the promoted site herein was assessed at Candidate Site Stage and the Assessment undertaken. The Stage 2 Assessment of the site concluded the following: 'Whilst adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.' The assessment/conclusion implies that as this site ('Land off Sandy Lane, Ystradowen') has not been built out and is "currently under review", it suggests that 'Land at Ystradowen' (430) does not adjoin the existing LDP settlement boundary. Given recent developments however associated with the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024) and the site being currently being "built out" and work commencing on site, the site no longer adjoins "the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review". Accordingly, and given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.
The following specific photo evidences 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48) is being built out the western boundary of the promoted Site ID 430. This therefore clearly highlights that the site's boundary is representing the existing settlement limit in the existing development plan. Accordingly, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the existing LDP settlement boundary.
Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gr
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3gt
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g4
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g7
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3g8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gv
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gc

7068 Support

Document Element: SP7 – AFFORDABLE HOUSING PROVISION

Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:
Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle.

Full text:
Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries.

It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.

Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."
The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.
5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.
In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household

population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward

sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.
Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part
Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.
That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.
There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix. The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate

level and mix of affordable housing in all proposed residential developments.
In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.
Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.
The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.
8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part
Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.
The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;
• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.
The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.

The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the

national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.

Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.

In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.

Policy CI1 – Open Space Provision

Position: Support in principle / Object in part

Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.

The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.

There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.

Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.

Policy SP4 – Placemaking

Position: Support in principle / Comment

Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.

That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.

Suggested wording amendment:

"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."

That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.

Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part

Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence

on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider

catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment
We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services

and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7069 Comment

Document Element: SP7 – AFFORDABLE HOUSING PROVISION
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

The wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for

residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing

Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."

The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:

"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.

5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.

5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."

Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:

• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;

• Does not actively seek to address the area's ageing demographic;

• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;

• Does not seek to leverage any of the investment into the region through the CCR City Deal;

• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and

• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.

In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.

That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.

The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.

This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.

The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of

affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years

to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.
Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part
Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.
That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.
There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix. The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.
In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.
Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.
The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required

to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.
8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part
Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.
The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;
• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.
The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the

Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any

such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.

In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.

Policy CI1 – Open Space Provision

Position: Support in principle / Object in part

Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.

The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.

There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.

Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.

Policy SP4 – Placemaking

Position: Support in principle / Comment

Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.

That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.

Suggested wording amendment:

"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."

That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.

Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part

Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.

However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.

We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on

developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and

would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."

The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:

Impact upon Character and Setting of the St Nicholas Conservation Area

Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.

The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:

• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;

• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;

• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and

• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.

Countryside Impacts

The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.

The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.

Agricultural Land Quality

Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.

As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.

Appendix 2 – Summary of Assessment

We comment on the Council's Summary of Assessment as follows:

• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.

• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.

• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.

• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.

• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.

• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.

• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO_2.

• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National

Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7070 Object

Document Element: SP7 – AFFORDABLE HOUSING PROVISION
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of

important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.

The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.

The remainder of these representations address the specific policies of the Deposit Plan.

Deposit Plan Plan Period Position: Object

Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.

On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.

Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.

Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part

Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.

Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.

This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.

St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.

Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:

"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)

Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:

St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.

Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.

Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.

There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of

locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."
The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this

may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.
5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.
In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment).

Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation

portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.
Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part
Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.
That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.
There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.
The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.
In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.
Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.
The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the

Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.

8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.

The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.

Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:

• the Plan is overly reliant on a small number of key sites;

• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;

• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and

• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.

The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.

Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.

The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:

• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.

• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.

• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.

All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.

In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.

Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part

Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.

However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also

requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.

Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.

The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.

We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.

St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.

Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object

Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.

There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.

A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.

Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.

In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.

Policy CI1 – Open Space Provision

Position: Support in principle / Object in part

Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.

The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.

There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.

Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.

Policy SP4 – Placemaking

Position: Support in principle / Comment

Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.

That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.

Suggested wording amendment:

"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."

That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.

Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part

Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.

However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.

We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.

Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.

Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part

Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.

Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.

There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.

The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.

Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.

Land at St Nicholas / omission from the Deposit Plan Position: Object to omission

Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.

The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.

Deposit Plan Conclusion

Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.

In particular:

• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;

• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;

• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;

• the Plan relies too heavily on key sites, rolled forward sites and windfalls;

• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and

• the omission of St Nicholas is not justified by the Council's own evidence base.

The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.

For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.

Candidate Site Register - Site ID 486

Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.

Stage 2 Candidate Site Assessment

The Council's Stage 2 Candidate Site Assessment states:

"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."

The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:

Impact upon Character and Setting of the St Nicholas Conservation Area

Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.

The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:

• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the

south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.

Countryside Impacts

The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.

The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.

Agricultural Land Quality

Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.

As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.

Appendix 2 – Summary of Assessment

We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.

Suitability for Allocation and Key Benefits

For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.

The proposed development of the site would deliver the following key benefits:

• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

Increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites.

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7093 Object

Document Element: SP7 – AFFORDABLE HOUSING PROVISION
Respondent: Barratt Redrow Homes [2669]
Agent: Turley

Summary:

This policy seeks to deliver only 3,070 affordable homes over the plan period, which is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.

Full text:

Policy SP1 - Sustainable Growth Strategy
Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.
It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.
In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government

Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"
Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be concentrated is supported.

Policy SP2 - Settlement Hierarchy
The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable. As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Policy SP4 - Placemaking
We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.
The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses... ' or to be developed at 'high densities... and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.
Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Policy PGDl - Creating Well Designed and Inclusive Places
There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy CII - Open Space Provision
The wording of Policy CII, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the

Deposit Plan but Policy CII should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy CII requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7094 Comment

Document Element: SP7 – AFFORDABLE HOUSING PROVISION

Respondent: Barratt Redrow Homes [2669]
Agent: Turley

Summary:

The provision of a range of tenures, types and sizes should be assessed on a site-by-site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.
It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SP8.

Full text:

Policy SP1 - Sustainable Growth Strategy
Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.
It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.
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The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

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The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

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Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific

Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the

Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy CII - Open Space Provision
The wording of Policy CII, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy CII should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy CII requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7095 Support

Document Element: SP7 – AFFORDABLE HOUSING PROVISION
Respondent: Barratt Redrow Homes [2669]
Agent: Turley

Summary:

The provision of a range of tenures, types and sizes of affordable homes is supported in principle.

Full text:

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The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.

If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be

delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy Cll - Open Space Provision
The wording of Policy Cll, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy Cll should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy Cll requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

-

Sound: Not specified

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7137 Object

Document Element: SP7 – AFFORDABLE HOUSING PROVISION
Respondent: Peter Stone Properties Ltd [1182]
Agent: Geraint John Planning Ltd

Summary:

Without a suitable supply of affordable housing delivered over the Plan period, trends that result in an extremely unbalanced demographic will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £800,000 over the last 12 months, there is a clear and established need for new homes in the Bonvilston area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)

Para 5.25 states “Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An ‘affordable housing led’ scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord”.

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

“Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided.”

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision’s clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Bonvilston. The Vale is characteristically ‘rural’, and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the “soundness” of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states “The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities”. The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of ‘key sites’ to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of

1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory

are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when

coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites – not least given that 3 of the 4 allocated affordable housing-led sites are located west of Cowbridge.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land South of A48, Bonvilston (Site ID: 435 / 3857) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area (which Bonvilston is located within), and a need for 242 affordable homes in the Wenvoe housing market area. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

Securing further delivery of Affordable Units

As set out above, it can be assumed that the affordable housing-led allocated sites only provide 61no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included

within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to meet the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Bonvilston and the proposed site. As outlined within these representations, it is considered that the site (ID 435 / 3857) represents a sustainable, deliverable and acceptable site. This proposed allocation is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

- Cowbridge Comprehensive School;
- St Nicholas Primary School;
- Cowbridge Health Centre; and
- Cowbridge town centre for various Retail Services.

Accordingly, the settlement of Bonvilston represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Bonvilston, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 "For the purposes of this policy, 'small-scale' will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites

with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

Deliverability of the Site

In summary, the site seeks to deliver the following key elements:

• In summary, the opportunity of the site seeks to deliver:
• Residential development comprising up to 25 dwellings, with at least 50% affordable housing in accordance with Policy SP2,
• Highways infrastructure within the site;
• Upgraded access to the site;
• Strong legible pedestrian and cycle connections throughout the site and with the existing settlement;
• Green Infrastructure; and
• Sustainable Drainage Systems (SuDS).

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements

of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land South of the A48, Bonvilston (Site ID: 3857) sets out that the position of the site at the Deposit Stage is as follows:

"Notwithstanding the amendment from a market led to an affordable housing led scheme (original CS 435), the other reasons why the site was previously discounted still remain.
The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area.
Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48.
The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable. There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing."
Conservation Area
In terms of the assertion that "The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area, this is strongly disputed.

Whilst it is acknowledged that the site lies within the Bonvilston Conservation Area, the conclusion that it would be adversely affected is not considered to be accurate. Firstly, the site as it currently stands, consists of an open field. This does not match the conservation area which is characterised primarily by residential dwellings of varying densities, and as such, it is considered that development of the site with sensitively designed buildings would enhance as opposed to harming its surroundings.

Secondly, the large residential development to the north of the site, 'Land at Sycamore Cross' ref. 2015/00960/FUL encroaches on the Bonvilston Conservation area but was deemed acceptable by the LPA. Although not all of the site is within the Conservation Area, it's encroachment and presence adjoining and surrounding a large proportion of the area is considerable and was deemed acceptable by Officers in 2017. Given this, a development at the Land South of the A48 should be deemed acceptable, as it follows the same principles albeit at a much smaller scale.

Highways
As for the statement that "Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48", this is also strongly disputed.

The site is located immediately adjacent to the adopted highway where it is proposed to upgrade and enhance the existing gated access point. Due to the existing access point, it is not considered that 'major' highway mitigation works would be needed, rather this would be enhanced and improved as part of the proposed development. Furthermore, given the nature of the road, with long views extending in both directions, it is anticipated that appropriate visibility

splays could be achieved to enable safe access and egress. As such, it is considered that the site would achieve appropriate highway access within the need for "major" highway mitigation works.

Agricultural Land Classification
The Detailed Site Assessment also sets out that "The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable." This is strongly disputed.

A review of the Agricultural Land Classification Predictive Map indicates that the site lies primarily within 'Grade 2: Very good quality agricultural land' but no Grade 1 land is present. Further assessment and tests to establish the quality would

therefore be undertaken in due course to confirm the quality of the land. However, it is not considered that it would be suitable to farm in any event given the location immediately adjoining existing residential development and the fact that it is within private ownership. Overall, given that the site is relatively small with a gross area of 0.88 hectares, it is not considered that its development would result in a detrimental or significant loss of agricultural land – not least given that site is not capable of beneficial agricultural production due to its limited size.

Housing / Housing Land
Further to the above, it is also set out that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing", however, this is not considered to be entirely accurate.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area and a need for 242 affordable homes in the Wenvoe housing market area. This need has not been met through the allocations of sites within the RLDP, nor has it been met through outstanding commitments.

As outlined in Annex 1, it can be assumed that the affordable housing-led allocated sites will only provide for 61no. affordable dwellings within the Rural Vale, comprising 4no. sites that are expected to deliver approximately 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. Therefore, more sites should be allocated in order to secure the delivery of a higher number of affordable housing units to meet the target.

As set out within Annex 1, it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, however, there is serious concern regarding the deliverability of these sites, which would result in a significant gap in the total affordable housing that is delivered. Therefore, allocating a greater number of affordable housing-led sites would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in the both the overall affordable housing need, and the need for the St Nicholas & Llancarfan housing market area, being unmet, with demand continuing to outstrip supply.

The LHMA 2023 sets out the existing stock and planned supply of affordable housing over the next 5 years (up until 2028). This assessment found that the housing market area of St Nicholas & Llancarfan has a committed supply of 4no. one beds, 11no. two beds, and 3no. three beds, with 2 no. three beds as expected re-lets. The assessment also identifies a committed supply of 39no. units for intermediate housing.

The LHMA also sets out the existing stock and planned supply for Wenvoe, identifying the committed supply of social rent homes to be 12no. one beds, 11no. two beds, and 5no. three beds, with 7no. one beds and 8no. two beds as expected re-lets. There is no committed supply for intermediate housing in Wenvoe.

It should be noted that the development of 'Land East of Nicholas' (Campbell Court and Cae Newydd), has now been completed, and as such, can not form part of the housing land available. The latest Pre-Application Response for the site subject to these representations (Land South of the A48, Bonvilston) accounted for the development of the site in

St Nicholas, stating that "even after the developments at St Nicholas and Culverhouse Cross, there was the need in the Wenvoe ward for 1 Bed 71, 2 Bed 49, 3 Bed 29, 4 Bed 7, 5 Bed 5, Total 161".

It should also be noted that there are existing commitments within the Bonvilston area ('Land to the east of Bonvilston'), however, the deliverability of the existing commitment is seriously questioned. Application Ref. 2015/00960/FUL was approved in July 2017, with the Housing Land Supply and Housing Trajectory Report (December 2025) confirming that of the total 120 units permitted, only 40 had completed by 1st April 2025, with the remaining 80 units not started by this same date. Of the 80 units not started, 25 units are affordable homes.

It is well known that phase 1 of the development at 'Land to the east of Bonvilston' has faced difficulties which has led to the development remaining incomplete. This does of course put into question the overall deliverability of the site, and raises concerns about the units that were, and still are, required within the Bonvilston area.

The allocation of the site promoted herein would not only help in the short term in meeting the overall affordable housing target for the Plan, but would also assist in meeting the unmet needs of affordable housing within Bonvilston – not least given the serious concern regarding the deliverability of the committed supply of housing within the St Nicholas & Llancarfan housing market area.

For the reasons set out above, and in light of the information provided within the LHMA 2023 and the Housing Land Supply and Housing Trajectory Report (December 2025), it is evident that there is considerable need for affordable housing within Bonvilston, and accordingly, the housing market areas of St Nicholas & Llancarfan, and Wenvoe. There have not been any sites allocated to assist within meeting the local need, and more sites should be allocated in order to secure delivery of a higher number of affordable housing units to meet the overall target of the Plan.

The contention that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing" is therefore strongly disputed – not least given that there is a clear and evident need to allocate more affordable housing-led sites in order to meet the target set out in the Plan.

Interim Summary

In summary, it is considered that the site subject to these representations would not have an adverse impact on the character and setting of the Bonvilston Conservation Area, nor would major highway mitigation works be required to enable safe vehicular access on to the A48. Moreover, it is considered that the site's classification as BMV Agricultural Land does not pose a fundamental constraint to development – as the site represents a relatively small parcel with a gross area of 0.88 hectares, which is not capable of beneficial agricultural production due to its limited size.

There is also a considerable need for the affordable housing in Bonvilston and the housing market area of St Nicholas & Llancarfan. The site promoted herein would assist in meeting these local needs and should be allocated accordingly.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage

As demonstrated above, there has only been one change to the scoring attributed to the site, this being a change from 'red' to 'amber' for 'Developer Interest'. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with these representations accordingly (see Appendix B).

Whilst detailed submissions were made on the previous assessment, it is considered pertinent for the scoring of the key criteria's to be addressed as part of these representations. As such, these have also been discussed below.
Developer Interest

As set out above, the Detailed Site Assessment for 'Developer Interest' has changed from 'red' to 'amber'. The assessment methodology for this section of the assessment has been extracted below for reference.

As set out above, 'amber' refers to there being no development interest identified at this stage, however, there is evidence to indicate that the site is being actively promoted by the owners.

The representations made to the Preferred Strategy (Appendix B) sets out that whilst the site does not yet have an agreement with a developer to take on the land, it is considered that this would be achieved should the site be allocated, and planning permission granted. Newydd Housing association have been engaged previously and had agreed to take the site forward as a 100% affordable scheme, albeit is also considered that they could take on the affordable units as part of a mixed tenure scheme.

In addition to Newydd, the site promoter has also received an offer from a private social housing provider who would be prepared to support the site as a mixed tenure scheme.

This position has not changed since the Preferred Strategy stage, and is considered that there is continued developer interest for the site. This is not considered to change at any point – not least given the discussions held between the owners of the site in questions and developers of interest.

Environmental and Physical Constraints

As set out at the Pre-Application Stage. the site underwent a Preliminary Ecological Appraisal in September 2022 which identified that whilst some precautionary measures were recommended in terms of protecting priority habitats and reptiles, the site is not fundamentally constrained from development on ecological terms. Given this, it is considered that further ecological surveys would be undertaken at the planning stage to inform any development proposals and ensure the safeguarding of the natural environment.

Access to Key Services (Retail, Primary Schools, and Health Services) and to Services and Facilities

As set out within the representations made to the Preferred Strategy, the site is located within a maximum of a 20-minute bus journey to a version of every key service listed, due to the proximity of the site to settlements such as Cowbridge, Culverhouse Cross and St Nicholas. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Bonvilston without the need to travel by car.

To reiterate, the site 'Land South of the A48, Bonvilston' is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Concluding this allocation as 'unsustainable' in regard to 'availability of local

facilities in and around settlements' is not accurate. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

• Cowbridge Comprehensive School;
• St Nicholas Primary School;
• Cowbridge Health Centre; and
• Cowbridge town centre for various Retail Services.

It should also be noted that Bonvilston contains a number of facilities within a short and level walking distance of the site, including the village shop and Café, as well as the Red Lion Public House.

Given the accessibility of the site to other settlements, and the fact that these are made accessible by bus and active travel routes, it is considered that the site should be concluded as sustainable in regard to access to key services.

Summary and Conclusion

As evidenced above, and within the representations made to the Preferred Strategy (Appendix B), there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location, and site, are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston.

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing

trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

- "Time period of pre-application discussions/PAC consultation" = 4 months
- "Time between submission of planning application and determination" = 6 months
- "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicated in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.

Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver

900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet

unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above the site was not considered suitable for further consideration with the site scoring negatively (red) in a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale

affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site has been outlined as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Land South of A48, Bonvilston.

Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3jp
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3kr
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k3
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k6
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kf
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kh
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z5

7159 Object

Document Element: SP7 – AFFORDABLE HOUSING PROVISION
Respondent: Wig Fach Property Company Ltd [2373]
Agent: Geraint John Planning Ltd

Summary:

Without a suitable supply of affordable housing delivered over the Plan period, trends that result in an extremely unbalanced demographic will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ogmore By Sea area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the

rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either Key Settlement, Service Centre settlement or Primary Settlements, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Ogmore By Sea. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently

being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a

'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that the should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 124 affordable homes in the St Brides Major local housing market area (which Ogmore is located within). As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

It is questionable whether Wick has the capacity to accommodate 50 new dwellings, given the sustainability and rural nature of the area. As a result, it is suggested that the number of homes allocated in Wick is reduced and that a further

allocation in St Brides Major is secured, in order to facilitate supporting the delivery of affordable housing through the housing market area, rather than in one minor rural settlement. The sustainability of Ogmore has been assessed, both by the Council through the Sustainability Appraisal and again, through our assessment of the site.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a

target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4 % of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.

Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ogmore and the proposed site. As outlined within these representations, it is considered that the site (ID xxx) represents a sustainable, deliverable and acceptable site. The site is within a maximum of a 22- minute bus journey to a every key service listed, due to the proximity of the site to settlements such as Bridgend. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Ogmore By Sea without the need to travel by car. The site is located within 5 miles of Bridgend, and within a maximum 22-minute bus journey of the following services:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre for various Retail Services

Moreover, Ogmore has benefitted from the recent development of the Ogmore By Sea Village Hall, which provides space for community activities and events to take place. The hall also includes a coffee shop (Welsh Coffee Company), which only adds further to the daily services provision available within the settlement. Access to the hall and coffee shop is directly provided for pedestrians from the Main Road, which allows for direct access from the site.

Accordingly, the settlement of Ogmore represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

It is acknowledged that the site also lies within the Glamorgan Heritage Coast and this point is addressed further below.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ogmore By Sea, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a ‘cap’ of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a ‘cap’ limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 “For the purposes of this policy, ‘small-scale’ will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area.”

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

Policy DNP3 – Glamorgan Heritage Coast

Given that the site is located in the Glamorgan Heritage Coast, it is noted that the following policy is of relevance to any future development on the site. Criteria 4 of Policy DNP3 states:

“The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development that accords with National Policy.”
It is also noted that supporting Para 6.422 “In seeking to protect the Glamorgan Heritage Coast, the Council acknowledges that there are some built up areas within the boundary, including the Minor Rural Settlement of Ogmore. In addition, the Vale of Glamorgan rail line crosses part of the Heritage Coast designation in the location where a new station at St Athan is proposed. Whilst being mindful of the need to protect the special qualities of the Glamorgan Heritage Coast, the Council accepts that development within these areas is appropriate, subject to relevant policies of the Plan”(GJP emphasis).

We would offer general support for this policy, and consider this to provide flexibility which allows for certain forms of development. However, we would suggest that the policy wording should be amended to reflect that ‘housing’ should be supported in the Glamorgan Heritage Coast, providing that the policy exceptions are met. Therefore, the following amendment is proposed as part of the policy should be changed to include “small scale housing” or something similar. The proposed amendments to Policy DNP3 are outlined below in red:

“The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development, including small-scale housing proposals that accords with National Policy.”

Again, this would ensure that suitable housing developments can be delivered in the Plan period, to meet the housing needs of the Vale of Glamorgan – particularly in respect of affordable housing.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in ‘Annex 2’ of our representations, the site has overcome the ‘constraints’ set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the “soundness” of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan’s housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their

extremely limited contribution to the targeted need for affordable housing;
• Object to Policy DNP3 – Glamorgan Heritage Coast, given the lack of recognition for the potential for small-scale housing proposals;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land at Hazelwood, Ogmore By Sea (Site ID: 3855) sets out that the position of the site at the Deposit Stage is as follows:

"The original site as ruled out as the development would represent unacceptable intrusion in to the open countryside. Whilst the site has now been identified for an affordable housing led development, the original reason for ruling it out still remains."
In terms of the assertion that "the development would represent an unacceptable intrusion into to the open countryside", this is strongly disputed, in that the development of the site would represent a natural rounding off of the existing settlement boundary. An extract of the site relative to the settlement boundary is provided below, which clearly shows that the development of the site would not extend beyond the existing settlement pattern that exists in Ogmore.

Site Outlined in Red and Settlement Shaded in Blue
As clearly demonstrated in the above mapping, the site would extend no further eastwards than the existing housing area to the south of the site. Equally, the site would not be extending any further north than the existing settlement pattern in Ogmore. This position is further supported by the wider aerial view of the site provided overleaf:

Wider Aerial View of Site Outlined in Red and Settlement Shaded in Blue

In summary, it is considered that the proposed allocation of the site represents a logical rounding off of the existing settlement, as depicted in the mapping provided above – where the site follows the existing envelope of the settlement. The site does not extend any further eastwards than the established built form located immediately to the south; indeed, it sits comfortably within the same development line.

As such, it cannot be considered that the site represents an 'intrusion' into the countryside, as the site would be visually and functionally related to the settlement. It therefore follows that the site would be read as part of the settlement, and not the wider rural landscape.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage
As demonstrated above, there are no changes to the scoring attributed to the site. Detailed submissions were made on

the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with this submission (see Appendix A).

Sustainability

Notwithstanding the above, it is considered that the site represents a more sustainable location than what was previously assessed at Preferred Strategy stage, in light of the Ogmore by Sea Hall development. The Hall acts as a community facility, whereby the space is available for hire by local community groups such as birthday parties, weddings, group meetings, and other such similar uses. Moreover, a café (Welsh Coffee Co) is located within the premises which sells both food and drink.

The hall and café are within walking distance to and from the site, where new access facilities have been implemented from Main Road directly to the building, to allow access for pedestrians and cyclists. This is illustrated in the image below:

Walking and Cycling Facilities

The Tusker Rock pub and post office are also located along Main Road, all of which are within walking distance to the site.

Accordingly, the site is well served by new amenities (i.e. community hall) that comprehensively improves the sustainability of the site / settlement, and in turn, improves the sustainability credentials of the site promotion. It therefore follows that the site represents an acceptable location for residential development, and the site should be looked upon favourably accordingly.

It is also the case, as set out in previous representations, that the site is within a maximum 22-minuted bus journey of the following services and facilities:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre.

As such, key services and facilities can be access by sustainable travel over and above the existing level of provision available in Ogmore By Sea (as discussed above).

Accordingly, the relevant 'red' scorings in the Council's assessment should be updated to reflect the site's suitability and sustainability to accommodate the proposed residential development of the site.

Glamorgan Heritage Coast

Insofar as to the position regarding the site's location within the Glamorgan Heritage Coast, detailed submissions are made not only in the Preferred Strategy representations, but also in Annex 1 of this submission. In short, given the pressing need for such development (particularly affordable housing) to come forward in the Plan period to meet ever-increasing needs, development of this nature should be considered more favourably – not least that, as outlined in this Annex, the site would not extend any further that the existing settlement boundary.

Accordingly, the site would be perceived to form part of the settlement of Ogmore By Sea, and not the wider landscape, and therefore, would not have any detrimental impact on the Heritage Coast in any respect. The scoring should be amended accordingly to reflect this position.

Climate Change

As outlined in previous representations, the development will incorporate climate change measures, such as EV charging points, PV panels, as well as adopting sustainable materials for construction whilst maximising the potential for the dwellings to be energy efficient. Accordingly, the development will be built to high sustainable standards, and therefore, the scoring of the site should be amended as a result.

Summary and Conclusion

It has been evidenced above that there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston;

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be

fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicated in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.

Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South

Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

“A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth.”

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the ‘Rectory Field, St Brides Road’ site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

‘Land West of Maendy Road’ has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the ‘Candidate Assessment at Preferred Strategy Stage’ (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the “soundness” of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is “sound” (i.e. its allocation is considered to be “unsound”).

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of ‘Land to north and west of Westwinds Business Park’:

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and

• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale

affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Hazelwood, Ogmore By Sea, the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below.

With reference to the above:

• In terms of public transport, there are two bus stops located approximately 200m (3-minute walk) from the site ('Ogmore By Sea Post Office'), with the '303' providing services between Llantwit Major and Bridgend.

• The site is located 200m (3-minute walk) from the 'Ogmore By Sea Post Office' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

• The site is also located 50m (1-minute walk) from a children's park.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities. This

Furthermore, the settlement of Ogmore By Sea has been ranked higher than Llangan (which the site 'Land to north and west of Westwinds Business Park' is located within) in the VoG Sustainable Settlements Appraisal, and therefore, is

considered to constitute a more sustainable location to accommodate residential growth. Most notably, Ogmore By Sea scores '13' in respect to 'Daily Facilities' whereas Llangan only scores '3', evidencing that residents in Ogmore have much better access to services within the locality as compared to Llangan.

Given the above, 'Land at Hazelwood, Ogmore' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Hazelwood, Ogmore' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help

sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3zt
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3z4
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z6
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3z8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zv
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zc
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zw

7191 Object

Document Element: SP7 – AFFORDABLE HOUSING PROVISION
Respondent: H Jones, L Sungur and P John [3741]
Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:
Given the concerns raised with regard to Policy SP1 there is fear that the affordable housing numbers will not be sufficient to meet need. This therefore brings the Deliverability of the plan in to question (Test of Soundness 3).

Full text:
Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis. Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

The inclusion of the site within the settlement boundary is logical especially when viewed in the context of the linear settlement of Fferm Goch. In addition the site is further suited to development allocation as the northern and southern boundaries are built up and the main road runs along the eastern boundary. A flexible approach is encouraged with regard to the delivery of the dwellings in relation to a variety of factors and policy provisions including the housing needs across the Vale, the limit on numbers of rural affordable led sites in minor rural settlements, viability implications relating to obligations/carbon Zero and sustainability obligations and the potential to extend the allocation if the need for homes requires.

The 3 land owners remain committed to this development and local developers are waiting to deliver the allocation.

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

The test of soundness for a Local Development Plan (LDP) is a critical component of the planning process to ensure that the plan is prepared in accordance with legal and procedural
requirements. It involves demonstrating that the plan is 'sound' based on three tests set out by the Welsh Government in the Development Plans Manual (Edition 3). These tests have therefore been considered in our representation, the tests include:

• Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)
• Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
• Test 3: Will the plan deliver (i.e. is it likely to be effective?)

SP1 – Sustainable Growth Strategy

The promotion of small scale affordable housing led development outside of the SGA, as proposed by SP1 is important as this provides essential affordable and market homes in the rural locations of the Vale as well as the SGA. Their provision is critical in meeting the area's housing needs, particularly affordable dwellings and supporting rural community stability, and ensuring that all parts of the Vale remain a place where people of all incomes are able to live and thrive during the plan period to 2036 and beyond.

The essence of Policy SP1 is supported, however it is well documented that there is a backlog in delivery of affordable homes and the need for affordable housing in the Vale is exacerbated by the high prevalence of single person households plus households comprising couples with no children, The Vale also has one of the highest affordability pressures in Wales. As stated in the 2023 Local Housing Market Assessment (LHMA) for the Vale of Glamorgan , the median house price in the Vale is around 8 times the median household income, well above the affordability threshold of 4.5 to 5 times household income for borrowing purposes. Private rents have also risen sharply in the area, commonly placing them out of reach for many low-to-middle income households. All of the above place further pressure on the need to deliver affordable homes in the locality.

The LHMA identifies a need for 1,075 affordable homes per year over the next 5 years based on principal projections (or 1,114 based on the RLDP projections). As mentioned previously past delivery rates fall significantly short and therefore a backlog is present, however despite the reported backlog the RLDP only proposes 3,070 (205/annum) affordable dwellings over the plan period to 2036. Despite the growth strategy of policy SP1 and allocations made through the RLDP, the figure of proposed affordable dwelling numbers is concerning as it falls significantly short of the demand evidenced within the most recent evidence of LHMA of 2023.

The housing figures quoted in SP1 indicate 7,890 dwellings (including the 3,070 affordable dwellings) to 2036, however these figures overall are inadequate over the plan period when considered against the 2022 WG household projections. The 2022-based household projections provide an indication of the future number of households, and their composition, based on population projections and assumptions about households from recent censuses. The vale of Glamorgan demonstrates an increase of almost 12% in the number of households between mid-2022 and mid-2032; note this is the highest percentage increase by Local authority in Wales and way above the average for Wales as a whole (that stands at around 7% increase). The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both open market, but particularly Affordable) development across the Vale.

Without targeted allocations outside of the SGA, as outlined in Policy SP1, the gap described above will continue to widen, forcing more residents to leave the area and weakening community cohesion.

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the RLDP the supporting text of Policy SP2 states:
'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

sustainable growth. Locating affordable-led developments in areas with existing infrastructure such as primary schools will reduce car dependency, lower carbon emissions, and contribute to the Council's climate change commitments.

Considering the above, the limit on small scale rural affordable housing led developments (RAHLD) to 25 for these settlements is questioned and further flexibility recommended on a case by case basis. It is understood the limit on numbers was imposed due to the existing scale of the settlement in which the RAHLD are located, however those allocations will only likely deliver at 50% affordable and therefore only provide 12.5 (or 13) affordable units as a maximum (note Fferm Goch would provide 11 affordable dwellings on current figures of 22 total dwellings). Given the concerns raised in response to Policy SP1 there remains an issue of whether the numbers proposed in the RLDP can meet the demonstrable need for affordable homes and if there is scope on a RAHLD to sensitively increase unit numbers without any material harm then the policy should be flexible to accommodate this.

Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the range of facilities and services provided in these settlements. It is also supported that these settlements are able to provide affordable led residential development of up to 50 dwellings (delivering 25 affordable units). However the provision of an increased number of units in the Primary Non SGA settlements must not be at the expense of a wider number of smaller rural sites with the ability to sustain smaller communities across the Vale, especially given the shortfall in numbers as outlined above.

PGD2 – Residential Development Densities

The best use of finite land is set out in PPW and consistent with the setting of the densities as prescribed in policy PGD2. The policy is considered to meet the 3 tests of soundness.

The approach of policy PGD2 is also supported through the proposed density of the site North of Westwinds business park, Fferm Goch in HG4 (4). This allocation that proposes to provide a density of just over 30/ha within Fferm Goch, a minor rural settlement.

SP6 – Housing Requirement

Affordable housing forms an important part of the housing requirement figures of Policy SP6. Whilst the total 122 dwellings proposed under policy HG4 is a relatively small contribution to the overall figures it provides important spatial distribution of homes across the Vale within the rural area.

Given the concerns raised with regard to Policy SP1 there is fear that the affordable housing numbers will not be sufficient to meet need. The site north of Westwinds business park, Fferm Goch has the ability to expand to the south (as per the CS Ref 398) in order to accommodate additional dwellings (both market and affordable dwellings in order to sustain the viability of the site).

SP7 – Affordable Housing Provision

In accordance with Policy SP7 the allocated site HG4(4) at Fferm Goch provides a range of tenures, types and sizes in response to the LHMA, waiting list data and Older persons housing strategy in order to provide for 11 dwelling units and contributing toward the 3,070 affordable requirement to 2036. Changes in the household composition mean more single person and small homes are required, plus older person accommodation for those wishing to downsize and stay in the area.

Please see comments for Policy SP1 / Policy SP2 above regards concern over the proposed housing numbers and supply of affordable homes against demand - this therefore brings the Deliverability of the plan in to question (Test of Soundness 3).

SP8 – Affordable Housing Requirements

Policy SP8 is supported in so far as contributing much needed affordable housing development commensurate with the size of the settlement in which it sits. We are encourage to see reference to the provision of affordable housing to be negotiated on a site by site basis considering evidenced viability fo the development.

The affordable dwellings proposed foster stability in rural areas by allowing a range of households (from single person to growing families) to stay in their local area.

Policy SP8 states 40% affordable for those developments in primary and minor settlements outside of the SGA yet 50% requirement on affordable housing led allocations in minor rural settlements (also outside of the SGA). This appears inconsistent and penalising those smaller rural sites that will already be more delicately balanced in viability terms by virtue of their limited size of 25 units. Further viability issues covered in other policies (such as SP20, relating to biodiversity, Net Zero and sustainability credentials must (with the required evidence submitted and assessed by the council as stated in Policy SP8) be flexibly reviewed to ensure sites are viable and deliverable as recognised by the Council, there is a danger the stringent requirements, especially for smaller sites, could render those sites unviable in the current climate with rising build costs.

HG4 – Rural affordable housing led sites

The allocation of land north of West Winds Business Park under policy HG4(4) for rural affordable housing led development of 22 units is strongly supported. Then allocation will assist in delivering homes in the rural Vale and contribute to the important stability to the settlement of Fferm Goch to 2036.

The extension of the settlement limit including the site north of West Winds Business Park is supported. The site provides an obvious infill to the small break in the built up area to both the north and south of the site, with the main road running to the eastern boundary of the site.

The inclusion of the site within the settlement of Fferm Goch is logical and in harmony with the existing linear settlement.

The proposal supports the aims of the Local Development Plan and the Welsh Government's commitment to increasing affordable housing supply. By providing for affordable led allocations the policy aligns with the Well-being of Future Generations (Wales) Act 2015 in aiming to promote a healthier, more equal, and cohesive community.

There is concern however surrounding the number of dwellings proposed and if the Plan seeks sufficient dwellings and affordable provision given the predicted need to 2036 shown in the LMHA.

SP13 – Community infrastructure and planning obligations

Policy SP13 demonstrates the importance of community infrastructure in sustaining both the residents well being and economic growth of an area. See also the response to Policy SP2 that refers to the allocation of housing in the rural areas specifically supporting those settlements with local primary school provision.

The viability of developments however must not be compromised in order to ensure delivery of the plan. To see in Policy SP13 that 'development viability' is recognised as a key factor in delivering community infrastructure under planning obligations, is supported. It is recommended that this recognition is replicated in other policies of the LDP in order that the third Test of soundness can be fully met; Deliverability – ensuring the plan is likely to be effective). See comments in relation to Policies SP8/CC1/SP16/CI1.

CI1 – Open Space Provision

Provision of open space in residential developments is supported. HG4(4) promotes open space within the draft allocation.

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

The provisions of SP16 are generally supported as practical measures to ensure important sustainable development is achieved.

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

Provision of Green Infrastructure in residential, and all developments is supported.

HG4(4) retains and enhances existing and will promote green infrastructure on the draft allocation.

The viability of developments however must not be compromised through green infrastructure provision - in order to ensure delivery of the plan. The 'development viability' should therefore be recognised as a key factor in delivering Green Infrastructure. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

Fferm Goch is one of the settlements that remains fully within and covered by the Upper and Lower Thaw Valley Special Landscape Area (SLA). It is noted that in such settlements, while there have been amendments to the identified settlement boundary (inclusion of HG4 (4) rural affordable led housing allocation) this has not affected the SLA designation in these areas. (Background Paper 45; Paragraph 1.16 refers).

The location of the small allocated site HG4(4) is nestled within the settlement of Fferm Goch. It is built up on both the northern and southern boundaries, with the main road running along the eastern boundary. There is no unacceptable harm to the SLA of the Upper and Lower Thaw valley.

The allocation of the site for residential development does not give rise to unacceptable harm to the special qualities and characteristics of the SLA, based on LANDMAP information, continues to be preserved.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

5130 Comment

Document Element: POLICY SP8 - AFFORDABLE HOUSING REQUIREMENTS

Respondent: Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]

Summary:

The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters.

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.
Without prejudice to the Minster's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.
National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.
After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:
Annex 1 – General Conformity with Future Wales
• No significant concerns
Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)
• Spatial Strategy and Primary Settlements
• Housing and Economic Growth Levels – Regional Collaboration
• Maximising Affordable Housing Provision
• Delivery & Implementation – General
• Gypsy and Travellers
• Renewable Energy
• Minerals
• Best and Most Versatile Agricultural Land (BMV)
• Welsh Language

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.
My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.
Yours sincerely,
Neil Hemington
Chief Planner Welsh Government

Annex 1 - Statement of General Conformity
The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).
There is a joint position statement on the relationship between Bridgend, Cardiff and the Vale of Glamorgan (BP20A), which considers population growth, migration patterns, housing completions, employment characteristics, demographics, commuting and transport links between the three adjoining authorities. The Welsh Government supports the principle of this work which demonstrates how change in the Vale of Glamorgan relates and complements growth in adjoining local authorities. This approach illustrates a good mechanism for other local authorities to follow.
Reasons
Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the

climate change and biodiversity emergencies, making the best use of resources.
Policy 1 and Policy 33 of Future Wales states that Cardiff, Newport, and the Valleys will be the main focus for growth and investment in the region. The strategic diagram (p163) also identifies the Vale of Glamorgan within the National Growth Area. The Vale of Glamorgan RLDP, specifically BP20A, provides robust evidence on the interrelationship and key issues with adjoining authorities, including their interaction and how they have shaped and influenced the scale/location of growth in the RLDP. This is set out in the three Joint Position Statements (JPSs).
BP45 'Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR), May 2024, provides further evidence on how the scale of growth indicated for the region has shaped the scale of future economic growth within the Vale of Glamorgan. This results in a higher level of employment growth in the Vale of Glamorgan primarily to increase self-containment and reduce out-flows to adjoining urban areas. Two key areas for future economic growth are identified at Cardiff Airport/Bro Tathan Enterprise Zone and Aberthaw Power Station.
The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.
On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):
Policy 1: Where will Wales grow
Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 6: Town Centre First
Policy 10: International Connectivity – Cardiff Airport
Policy 12 Regional Connectivity
Policy 33: National Growth Area – Cardiff, Newport and the Valleys
Policy 36: South-East Metro
Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.
With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.
The Level of Growth - Homes and Jobs
The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).
Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.

BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.
Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.
The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level of growth proposed in the plan.
We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.
The Welsh Government notes that BP0A identifies small and large windfalls, based on historic trends of 53/yr and 80/yr respectively. Also, the large windfalls are not included in the first two years of the trajectory, as per the DPM. A non-delivery allowance of 5% is identified, which reflects local characteristics in the Vale of Glamorgan. A flexibility allowance of 9.8% has been factored into the provision. The Welsh Government supports this approach, although whilst Appendix 1 contains a housing trajectory, there is no table to mirror that of Table 21, DPM. This should be included in Appendix 1. 6

Jobs: The Council's 10-year dwelling-led growth option results in a requirement for 4,875 new jobs (325 p/a) over the plan period. This broadly aligns with the projected growth for 5,338 (355 p/a) new jobs in the Employment Land Review (BP12) and as set out in Policy SP14.
The level of employment growth proposed (5,338 jobs) over the plan period is below the target in the currently adopted plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.
In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of homes and jobs proposed in the plan, which is in general conformity with Future Wales.
Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.
The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of

this approach is supported.
Paragraph 6.137 of the plan states:
“Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary.”
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?
Affordable Housing Exceptions Sites
Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.
Employment Land
The Council’s Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).
Delivery and Implementation
PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.
The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.
The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have ‘rolled over’ from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.
The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters.
It will be for the Council to justify deliverability supported by robust financial viability.
Gypsy and Travellers
The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are ‘immediate’ by 2026. WG note that 4 pitches have since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

Policy SP9 identifies a site at Llangan (0.76Ha) to accommodate the 7 pitches needed. It will be for the Council to demonstrate the appropriate site selection assessment process has been followed and that the site complies with requirements in PPW (4.2.35), Circular 005/2018 (paragraph 35) any relevant guidance and the DPM (5.80-5.85) to allocate a deliverable site in the plan period. The views of the relevant statutory bodies must also be agreed with no outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.
Renewable Energy
Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Could the Council provide an update on alternative options for a DHN in Barry?
It is welcome that the Renewable Energy Assessment (REA) has considered BMV policy, specifically for solar PV, and use of the Predictive ALC Map. The assessment has only considered non-BMV land (Subgrade 3b, Grade 4 and 5). The assessment would benefit from referencing the clarification provided in the DCPO letter of 1st March 2022 in respect of solar PV and BMV agricultural land for completeness.
The study identifies that in the Vale of Glamorgan solar development is more suitable than wind energy because of the

flight path of aircraft in the south of the County Borough. However, there are some opportunities for wind sites, but these are likely to be small (<10MW) where aviation risks are lower and there is some grid access. Conversely, there are large expanses of land suitable for solar areas (>10MW) to the West of the County Borough, where there is little existing development. The study identifies 20 large-scale solar areas but recognises that grid constraints may impact the ability of sites to come forward.
Solar and wind search areas (where appropriate) below the 10MW Developments of National Significance (DNS) have been identified (Policy CC3). The plan also includes a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW (Policy CC4). Policy CC3 makes reference to adhering to the criteria in Policy CC4. However, would it not be the case that if search areas have been identified in Policy CC3 have they not already met the criteria? If they would not, should they be identified in the first place? Clarity would be beneficial. The Welsh Government supports the approach but seeks clarity on the point raised.
The Welsh Government notes the proposed search areas for wind energy near Morfa Ystrad Owen/Nant Rhydhalog, according to the Peatlands of Wales Evidence Score Map, the search area includes areas of peatland (Evidence Score 4). The site is also a SINC. This raises concerns as to how the inclusion of this search areas meets the policy test in PPW 6.4.15, 1a and 1b (Stepwise) regarding avoidance of irreplaceable peatland habitats and PPW 6.4.34.
Policy CC4 refers to Developments of National Significance (DNS) in 6.344 and 6.346. This should now refer to Strategic Infrastructure Projects (SIP) which replaced DNS.
Minerals
The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in the Vale of Glamorgan. The Welsh Government policy clarification letter (dated 11 November 2021) identifies a surplus of 1.68mt of crushed rock. As there is a surplus of crushed rock reserves and a lack of sand and gravel production in the Vale, no specific allocations are required in the replacement plan. It is unclear whether a Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region been agreed, or does the latest Position Statement (July 2022) explain how any shortfall will be met across 9

the region, particularly for crushed rock, of which the Vale has a surplus? Clarification would be beneficial.
BMV Agricultural Land
The Welsh Government has engaged with the Council for land quality advice, survey advice and ALC survey validation for candidate sites. The LPA has produced a specific topic paper on BMV policy application. BP23A. The Deposit RLDP allocates 188 hectares of housing land, 5.62 ha is identified as BMV land (under 3% of total housing allocations). The RLDP:
• Has sought to avoid BMV land wherever possible;
• Uses the Predictive ALC Map as a core evidence layer to inform: The spatial strategy;
• Settlement hierarchy decisions; and
• Candidate site assessments.
•
• Directs strategic growth to areas with least BMV land
• Removes or avoids allocations where BMV impacts were significant or unjustified.
• Quantifies total BMV loss and demonstrates it is minimal (5.62ha) and proportionate at plan level.
• Applies a sequential approach through: Preference for brownfield and non-BMV sites;
• Replacement of higher-BMV sites with lower-grade alternatives where possible.
•
• Requires site-specific ALC surveys to verify actual land quality before allocation.
• Demonstrates that allocated BMV land is: Often small, fragmented, or constrained;
• Sometimes previously disturbed or incapable of being farmed differently from surrounding lower-grade land; and
• Necessary to deliver the Plan's housing strategy where reasonable alternatives are unavailable.
•

In conclusion, the Welsh Government consider the Authority has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy, and on that basis no objection is offered.
Green Infrastructure
Policy SP19 should explicitly reference the need for development to be accompanied by a Green Infrastructure Statement.
PPW12 requires decision makers to apply the step wise approach to GI, with enhancement secured at every stage where possible, there is no distinction made between the quality of the GI assets – the qualification in the policy statement that states proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure should be redrafted to remove the quality reference. The need to avoid an impact in the first instance should also be explicitly incorporated into the policy.
Criterion 1 (Policy SP20) should be redrafted – the stepwise approach in PPW 12 6.4.15 1a - does not distinguish between relative ecological value – the avoidance step applies to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.
Welsh Language
There is limited reference to the Welsh language in the plan, either potential adverse impacts arising through development, or mechanisms via a policy framework to support and grow the use of the language. There are references to a number of Welsh-medium schools (3.26) and the increase in the number of people able to speak Welsh according to the 2011 census (3.52) but there is no mention of the authority's Welsh Language Strategy or promoting or cross-referencing to the aims of 10

Cymraeg 2050: A million Welsh-speakers. Paragraph 6.81 of the plan refers to development north west of Barry:
“Land at North West Barry is allocated for a residential development of up to 376 dwellings and public open space. The site is in a sustainable location on the edge of the Barry, a key settlement, in a location that is well served by services and facilities, including a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium and Church in Wales) and two high schools (English and Welsh Medium) all located in reasonable walking distance. There is an active travel route along Port Road West, bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry. Barry station is 1.3 miles from the site entrance.”
There is no mention that the Council want to undertake a Welsh Language Impact Assessment (WLIA) so there appears no attempt to measure the impact on the Welsh schools resulting from housing development? Could the Council clarify if such implications have already been covered in the WLIA for the plan, ISA, or are any specific policies necessary?

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/syf

5961 Object

Document Element: POLICY SP8 - AFFORDABLE HOUSING REQUIREMENTS
Respondent: HBF (Mr Mark Harris) [538]

Summary:

The following wording in the policy should be deleted:

'The provision of affordable housing will be negotiated on a site-by-site basis, considering the evidenced viability of the development.'

The policy sets the required level of affordable homes, so there is no need to negotiate it on a site-by-site basis. This would create uncertainty for developers when negotiating site purchases and could also delay the delivery of new homes. It is also contrary to PPW 12 para 4.2.22, where it states, 'It is for either the applicant or the planning authority to demonstrate that particular exceptional circumstances justify the need for a viability assessment at the application stage.'

The flexibility to negotiate the level of affordable housing is a part of a later point in the policy where it deals with situations where sites are unviable to deliver the level of affordable hosuign required.

The last sentence of the policy should be reworded, as it currently creates uncertainty for developers when negotiating site purchases. It is also noted that a similar point is made at the end of Policy SP7, so the wording repeats another policy but uses different wording, adding to the confusion.

Full text:

The following wording in the policy should be deleted:

'The provision of affordable housing will be negotiated on a site-by-site basis, considering the evidenced viability of the development.'

The policy sets the required level of affordable homes, so there is no need to negotiate it on a site-by-site basis. This would create uncertainty for developers when negotiating site purchases and could also delay the delivery of new homes. It is also contrary to PPW 12 para 4.2.22, where it states, 'It is for either the applicant or the planning authority to demonstrate that particular exceptional circumstances justify the need for a viability assessment at the application stage.'

The flexibility to negotiate the level of affordable housing is a part of a later point in the policy where it deals with situations where sites are unviable to deliver the level of affordable hosuign required.

The last sentence of the policy should be reworded, as it currently creates uncertainty for developers when negotiating site purchases. It is also noted that a similar point is made at the end of Policy SP7, so the wording repeats another policy but uses different wording, adding to the confusion.

Change suggested by respondent:

Delete the wording 'the provision of affordable housing will be negotiated on a site-by-site basis, considering the evidenced viability of the development.'

Reword the policy point on unviable sites to include the ability to negotiate the level of affordable homes.

Sound: Yes
Attachments: None

6030 Object

Document Element: POLICY SP8 - AFFORDABLE HOUSING REQUIREMENTS
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:

Policy SP7 of the RLDP requires a mix of affordable housing based on evidence, targeting 3,070 dwellings, but lacks flexibility for site-specific viability. Paragraph 6.120 acknowledges that viability may affect delivery, yet this is not reflected in SP7. A uniform percentage approach may overlook technical complexities, contrasting with PPW guidance to consider site viability. Policy SP8 introduces flexibility, allowing site-by-site negotiation and independent viability assessment, and considers up-to-date housing needs. However, SP7 and SP8 conflict: SP7 mandates a rigid mix based solely on evidence, while SP8 permits adjustments, raising concerns for affordable-led schemes with significant planning obligations.

Full text:

Policy SP7 stipulates that in order to meet the affordable housing target of 3,070 dwellings during the RLDP period "a mix of affordable housing will be required, informed by the Local Housing Market Assessment LHMA, waiting list data and the Older Persons Housing Strategy. This should include a range of tenures, types and sizes of homes, as well as an appropriate balance of general needs and specialist accommodation".

Whilst it is understood that it is a core RLDP objective to deliver affordable homes in VoG which respond to identified need, Policy SP7 must allow for viability to be considered. Whilst paragraph 6.120 of the RLDP states "In calculating the affordable housing target, the Council recognises that the number of affordable homes delivered during the plan period could be lower as a result of site viability constraints or greater where they are on sites delivered by the Council, Registered Social Landlords or on land owned by the Welsh Government", this recognition is not transferred into the wording of Policy SP7.

The blanket approach to affordable housing requirement percentage across VoG fails to take into account that there may be unique technical complexities at individual allocations that are required to be overcome before sites can be delivered. This is in contrast to PPW paragraph 4.2.32 which states that: "When setting the affordable housing thresholds and/or site-specific targets planning authorities must consider their impact on site viability to ensure residential sites remain deliverable."

Policy SP8 sets out that Primary and Minor Rural Settlements should meet an affordable housing requirement level of 40%. We do query why affordable housing led allocations in the same geographic areas have a requirement of 50% affordable housing? It is understood from paragraphs 6.122-6.123 of the RLDP that the affordable housing percentage requirements for the settlements in VoG are being carried over from the adopted LDP. However, this does not explain why windfall sites in the Primary and Minor Rural Settlements outside of the Strategic Growth Area would need to provide a minimum 40% affordable housing and the Affordable Housing Led Schemes in the Primary and Minor Rural Settlements outside of the Strategic Growth Area would need to provide a minimum of 50%. Further evidence is required on this matter to ensure that Policy SP8 meets the second test of soundness (Is the Plan appropriate?).

Policy SP8 also states that: "The provision of affordable housing will be negotiated on a site-by-site basis considering the evidenced viability of the development." Policy SP8 also states: "Where developers claim that the target is unviable, a detailed viability assessment must be submitted and independently reviewed." The consideration of viability in Policy SP8 is endorsed as it is consistent with paragraph 4.2.32 of PPW.

Policy SP8 also states that: "The exact mix of affordable housing required will be considered on a case-by-case basis having regard to the Council's latest needs evidence at the
time of the application". Again, this level of flexibility is endorsed. However, we are concerned that there is contradiction between Policy SP7 (Affordable Housing) and Policy SP8 that needs to be addressed. As drafted Policy SP8 (which relates to all new residential developments in VoG including Affordable housing led allocations) allows flexibility for the delivery of mix of affordable homes as it allows for the exact mix to be considered on a case-by-case basis having regard to the Council's latest evidence needs. Yet, Policy SP7 (which relates to all affordable residential units to be delivered in the RLDP period) applies a blanket approach that requires the mix of affordable housing to be informed by the Council's evidence base only, with no flexibility or consideration for site-specific cases or viability. Thus, the two policies as drafted in the RLDP currently contradict one another. This is especially important for the affordable led schemes as the housing mix (affordable and market) can have a big impact on the viability of the scheme given that they have more onerous planning obligations.

Change suggested by respondent:

On the basis of the above, it is proposed that Policy SP7 and Policy SP8 should be aligned so that they are consistent with each other and provide flexibility on a "case-by-case basis". This would ensure that the RLDP will meet the third test of soundness (Will the Plan deliver?).

Sound: No

Attachments: None

6074 Object

Document Element: POLICY SP8 - AFFORDABLE HOUSING REQUIREMENTS
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:

Policy SP7 aims to deliver 3,070 affordable homes during the RLDP period, requiring a mix informed by the Council's evidence. Policy SP7 does not allow flexibility and viability considerations which are essential, especially given the Council's ambitious policies for net zero homes. Policy SP8 endorses site-specific negotiations and viability assessments, allowing flexibility in affordable housing mix. Thus, SP7 and SP8 as drafted currently contradict one another. This is especially important for the affordable led schemes as the housing mix (affordable and market) can have a big impact on the viability of schemes given that they have more onerous planning obligations.

Full text:

Policy SP7 stipulates that in order to meet the affordable housing target of 3,070 dwellings during the RLDP period "a mix of affordable housing will be required, informed by the Local Housing Market Assessment LHMA, waiting list data and the Older Persons Housing Strategy. This should include a range of tenures, types and sizes of homes, as well as an appropriate balance of general needs and specialist accommodation".

Whilst it is understood that it is a core RLDP objective to deliver affordable homes in VoG which respond to identified need, Policy SP7 must allow for viability to be considered. There is a lack of clarity around the term 'informed'. It is unclear whether the Council will require the mix reflect the LHMA etc or whether it is just a starting point for negotiation. It is assumed that it is just a starting point but this could helpfully be clarified.

It is noted that the Council has ambitious policies for both affordable housing and net zero operational homes. In working towards delivery of these it will be necessary to carefully consider site viability and there must be some flexibility in both Policy SP7 to ensure that necessary new homes are built.

PPW paragraph 4.2.32 states that: ""When setting the affordable housing thresholds and/or site-specific targets planning authorities must consider their impact on site viability to ensure residential sites remain deliverable." (Lichfields emphasis)

Policy SP8 also states that: "The provision of affordable housing will be negotiated on a site-by-site basis considering the evidenced viability of the development." Policy SP8 also states: "Where developers claim that the target is unviable, a detailed viability assessment must be submitted and independently reviewed." The consideration of viability in Policy SP8 is endorsed as it is consistent with paragraph 4.2.32 of PPW.

Policy SP8 also states that: "The exact mix of affordable housing required will be considered on a case-by-case basis having regard to the Council's latest needs evidence at the time of the application". Again, this level of flexibility is endorsed. However, we are concerned that there is possible contradiction between Policy SP7 (Affordable Housing) and Policy SP8 that needs to be addressed. As drafted Policy SP8 (which relates to all new residential developments in VoG including Affordable housing led allocations) allows flexibility for the delivery of mix of affordable homes as it allows for the exact mix to be considered on a case-by-case basis having regard to the Council's latest evidence needs. Yet, Policy SP7 (which relates to all affordable residential units to be delivered in the RLDP period) requires the mix of affordable housing to be informed by the Council's evidence base only, it is unclear the extent to which there is no flexibility or consideration for site-specific cases or viability. Thus, the two policies as drafted in the RLDP currently contradict one another. This is especially important for the affordable led schemes as the housing mix (affordable and market) can have a big impact on the viability of the scheme given that they have more onerous planning obligations.

Change suggested by respondent:

On the basis of the above, it is proposed that Policy SP7 and Policy SP8 should be aligned so that they are consistent with each other and provide flexibility on a "case-by-case basis". This would ensure that the RLDP will meet the third test of soundness (Will the Plan deliver?).

Sound: No
Attachments: None

6783 Comment

Document Element: POLICY SP8 - AFFORDABLE HOUSING REQUIREMENTS
Respondent: Persimmon Homes (East Wales) [1068]
Agent: Boyer Planning

Summary:

Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):

- Test 1 – Does the Plan Fit?
- Test 2 – Is the Plan Appropriate?
- Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision

In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to

positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.
Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.
In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically

to Cardiff but also inherently well connected by the existing rail network and other modes of public transport. Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan

Section 6: Policy Framework

This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.

Strategic and Spatial Choices (Placemaking)

Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority. Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.

As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.

However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.

For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility

to effectively meet local housing need from the outset.
In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.
Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual
As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement
From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes

that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.

In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

Policy SP2 – Settlement Hierarchy

In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.

Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.

Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.

Policy SSC1 – Development within Settlement Boundaries

Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.

Policy SP4 – Placemaking

In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.

The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.

In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car. Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.

The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.

Policy PGD1 – Creating Well Designed and Inclusive Places

Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.

On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.

Policy PGD2 – Residential Development Densities
Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and

supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
Loss of Allocated Employment Land
Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for

local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
Policy HG3 – Housing Led Redevelopment Opportunity
Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
Policy SP7 – Affordable Housing Provision
In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby

aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.

Policy SP8 – Affordable Housing Requirements

Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.

On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.

Policy SP10 – Sustainable Transport

Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.

In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.

In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.

Policy TR1 – Transport Proposals

Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.

In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.

Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.

Policy SP13 – Community Infrastructure and Planning Obligations

Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.

Policy CI1 – Open Space Provision

Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.

The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.

Productive and Enterprising Places

Policy CC1 – Residential Operational Net Zero Carbon Development
Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.
Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.
The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.
Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.
Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.
Distinctive and Natural Places
Policy SP19 – Green Infrastructure
In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.
The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.
Policy SP20 – Biodiversity and Ecosystem Resilience
In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.
Policy DNP1 – Special Landscape Areas

Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.

Policy DNP2 – Green Wedges

Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.

Policy DNP8 – Severn Estuary Recreational Pressure

Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.

The policy also provides no clear threshold or criteria for determining what level of activity would constitute “visitor pressure” or an “adverse impact” on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.

From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan’s ability to meet its housing requirements and risk finding the RLDP unsound.

Conclusion

Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes’ most pertinent comments on the consultation document are summarised below:

• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.

• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale’s position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan’s ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government’s Future Homes Standard (FHS), which is intended to ensure all new homes are “zero-carbon ready” through a consistent national Building Regulations framework.

• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.

• Persimmon are wholly supportive of Land North of Dinas Powys’ (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council’s proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location,

adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/38r

6916 Comment

Document Element: POLICY SP8 - AFFORDABLE HOUSING REQUIREMENTS
Respondent: Barratt Redrow Homes [2669]
Agent: Boyer Planning

Summary:

Barratt Redrow development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.

Full text:

1. INTRODUCTION
1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.
1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:
• Section 3 – The Vale of Glamorgan Key Characteristics;
• Section 4 – RLDP Key Themes, Vision, and Objectives;
• Section 5 – Sustainable Growth Strategy; and
• Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.
1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS
Settlement Pattern
2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.
2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Need
2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is

particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
3. RLDP KEY THEMES, VISION, AND OBJECTIVES
3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.
Key Themes
3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY

Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus

corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
5.10 For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is

predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

5.11 More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

5.12 Whilst Barratt Redrow appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range, having reviewed the Deposit Plan evidence base Barratt Redrow believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.

5.13 In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

5.14 Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).

5.15 In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

5.16 In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need. Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036) and therefore is made up of

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.

5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This

accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.

5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.

5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.

5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.

5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.

5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.

5.27 In summary, Barratt Redrow acknowledge the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

5.28 These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance and additional site allocations, such as Swn Y Coed, Wenvoe, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

Policy SP2 – Settlement Hierarchy

5.29 Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.

5.30 Accordingly, despite Wenvoe being identified as a primary settlement, Policy SP2 notes that development in this location will be limited to 'the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.' Similarly, it is noted that Policy SP2 does not consider Wenvoe to be an appropriate location for ''substantial additional growth''.

5.31 Barratt Redrow object to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified.

5.32 First of all, the Deposit Plan acknowledges that it performs a similar function to the Primary Settlements located within the Strategic Growth Area and it is described as one of the 'sustainable communities' in The Vale of Glamorgan Key Characteristics section, as noted previously in Section 3.

5.33 Likewise, the site benefits from excellent accessibility the local public transport network, active travel routes and local services. These characteristics fully accord with Welsh Government's strategic objectives and emphasise the fact that Swn Y Coed constitutes an appropriate location for future housing.

5.34 With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge''. Barratt Redrow do not consider this to be sufficient justification to discount the site from allocation as there would be limited impact on BMW agricultural land arising from the development of Swn Y Coed.

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available.

5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.

Policy SP4 - Placemaking

5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.
5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.
5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.
5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.
5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
Policy PGD1 – Creating Well Designed and Inclusive Places
5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.

5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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Unsustainable Location & Poor Connectivity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 &

Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.
• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.
• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.
• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.
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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply

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• HG1 (8) St Athan - Clive Road, St Athan

Policy HG3 – Housing Led Redevelopment Opportunity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.

• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).
• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4).Finally, the Council's own Viability Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of

coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.
• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.
• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:
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Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:
i. Space heating demand less than or equal to 40kWh/m2/year;
ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.
• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
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Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and

based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established 'defensible' limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be 'largely shielded from view by woodland blocks/strips'.
• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for 'infilling' the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.
• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
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Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.

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• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
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Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.
• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
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MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
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• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact

upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
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• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
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CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the Council's vision for the VoG.
• 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
• 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
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6. CONCLUSION
• Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.
• Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swn Y Coed, are necessary to ensure the RLDP is able to effectively meet
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Barratt Redrow welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that

it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Barratt Redrow support the requirements for affordable housing in new development. In its current form the proposed policies SP7 and SP8 lack sufficient flexibility for site specific circumstances and physical constraints which may impact upon delivery. This inevitably creates uncertainty for a number of sites, where the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities.
• From a planning perspective it is also important to recognise the additional benefits the site (Candidate Site Ref No. 437) could provide in accommodating the increased housing need generated by the suggested 15% flexibility allowance within a highly sustainable location. The principles of which clearly align with the Council's aspirations and would maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3ch

7072 Comment

Document Element: POLICY SP8 - AFFORDABLE HOUSING REQUIREMENTS
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and

the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could

accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."
The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.
5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership

earlier in their housing career due to “boom” or “recession” factors impacting on affordability are nevertheless able to “catch-up” later on – 80% of the gap at the age of 30 is “caught-up” by the age of 40. This finding supports the resumption of long-term household formation trends.
In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP’s preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government’s latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or “business as usual” response for the Vale. It points the other way.
This sits uncomfortably with the Council’s own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council’s own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object

Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.
Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part
Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the

affordable housing mix being “informed” by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.

That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.

There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.

The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.

In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.

Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part

Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.

The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.

In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be “informed” by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council’s latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan’s blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.

8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.

The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led

sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;
• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.
The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object

Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.

There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.

A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.

Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.

In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.

Policy CI1 – Open Space Provision

Position: Support in principle / Object in part

Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.

The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.

There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.

Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.

Policy SP4 – Placemaking

Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the

settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.

As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment
We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7106 Support

Document Element: POLICY SP8 - AFFORDABLE HOUSING REQUIREMENTS
Respondent: Barratt Redrow Homes [2669]
Agent: Turley

Summary:

Recognition that the provision of affordable housing should be negotiated on a site-by-site basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Full text:

Policy SP1 - Sustainable Growth Strategy
Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.
It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.
In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"
Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be concentrated is supported.

Policy SP2 - Settlement Hierarchy
The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable. As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Policy SP4 - Placemaking
We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.
The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses... ' or to be developed at 'high densities... and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.

Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Policy PGDl - Creating Well Designed and Inclusive Places
There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.

For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy Cll - Open Space Provision
The wording of Policy Cll, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy Cll should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy Cll requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as

part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7192 Support

Document Element: POLICY SP8 - AFFORDABLE HOUSING REQUIREMENTS
Respondent: H Jones, L Sungur and P John [3741]
Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

Policy SP8 is supported in so far as contributing much needed affordable housing development commensurate with the size of the settlement in which it sits.

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis. Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

The inclusion of the site within the settlement boundary is logical especially when viewed in the context of the linear settlement of Fferm Goch. In addition the site is further suited to development allocation as the northern and southern boundaries are built up and the main road runs along the eastern boundary. A flexible approach is encouraged with regard to the delivery of the dwellings in relation to a variety of factors and policy provisions including the housing needs across the Vale, the limit on numbers of rural affordable led sites in minor rural settlements, viability implications relating to obligations/carbon Zero and sustainability obligations and the potential to extend the allocation if the need for homes requires.

The 3 land owners remain committed to this development and local developers are waiting to deliver the allocation.

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

The test of soundness for a Local Development Plan (LDP) is a critical component of the planning process to ensure that the plan is prepared in accordance with legal and procedural
requirements. It involves demonstrating that the plan is 'sound' based on three tests set out by the Welsh Government in the Development Plans Manual (Edition 3). These tests have therefore been considered in our representation, the tests include:

• Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)
• Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
• Test 3: Will the plan deliver (i.e. is it likely to be effective?)

SP1 – Sustainable Growth Strategy

The promotion of small scale affordable housing led development outside of the SGA, as proposed by SP1 is important as this provides essential affordable and market homes in the rural locations of the Vale as well as the SGA. Their provision is critical in meeting the area's housing needs, particularly affordable dwellings and supporting rural community stability, and ensuring that all parts of the Vale remain a place where people of all incomes are able to live and thrive during the plan period to 2036 and beyond.

The essence of Policy SP1 is supported, however it is well documented that there is a backlog in delivery of affordable homes and the need for affordable housing in the Vale is exacerbated by the high prevalence of single person households plus households comprising couples with no children, The Vale also has one of the highest affordability pressures in Wales. As stated in the 2023 Local Housing Market Assessment (LHMA) for the Vale of Glamorgan , the median house price in the Vale is around 8 times the median household income, well above the affordability threshold of 4.5 to 5 times household income for borrowing purposes. Private rents have also risen sharply in the area, commonly placing them out of reach for many low-to-middle income households. All of the above place further pressure on the need to deliver affordable homes in the locality.

The LHMA identifies a need for 1,075 affordable homes per year over the next 5 years based on principal projections (or 1,114 based on the RLDP projections). As mentioned previously past delivery rates fall significantly short and therefore a backlog is present, however despite the reported backlog the RLDP only proposes 3,070 (205/annum) affordable dwellings over the plan period to 2036. Despite the growth strategy of policy SP1 and allocations made through the RLDP, the figure of proposed affordable dwelling numbers is concerning as it falls significantly short of the demand evidenced within the most recent evidence of LHMA of 2023.

The housing figures quoted in SP1 indicate 7,890 dwellings (including the 3,070 affordable dwellings) to 2036, however these figures overall are inadequate over the plan period when considered against the 2022 WG household projections. The 2022-based household projections provide an indication of the future number of households, and their composition, based on population projections and assumptions about households from recent censuses. The vale of Glamorgan demonstrates an increase of almost 12% in the number of households between mid-2022 and mid-2032; note this is the highest percentage increase by Local authority in Wales and way above the average for Wales as a whole (that stands at around 7% increase). The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both open market, but particularly Affordable) development across the Vale.

Without targeted allocations outside of the SGA, as outlined in Policy SP1, the gap described above will continue to widen, forcing more residents to leave the area and weakening community cohesion.

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the
RLDP the supporting text of Policy SP2 states:
'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'.(Paragraph 6.16)

Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

sustainable growth. Locating affordable-led developments in areas with existing infrastructure such as primary schools will reduce car dependency, lower carbon emissions, and contribute to the Council's climate change commitments.

Considering the above, the limit on small scale rural affordable housing led developments (RAHLD) to 25 for these settlements is questioned and further flexibility recommended on a case by case basis. It is understood the limit on numbers was imposed due to the existing scale of the settlement in which the RAHLD are located, however those allocations will only likely deliver at 50% affordable and therefore only provide 12.5 (or 13) affordable units as a maximum (note Fferm Goch would provide 11 affordable dwellings on current figures of 22 total dwellings). Given the concerns raised in response to Policy SP1 there remains an issue of whether the numbers proposed in the RLDP can meet the demonstrable need for affordable homes and if there is scope on a RAHLD to sensitively increase unit numbers without any material harm then the policy should be flexible to accommodate this.

Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the range of facilities and services provided in these settlements. It is also supported that these settlements are able to provide affordable led residential development of up to 50 dwellings (delivering 25 affordable units). However the provision of an increased number of units in the Primary Non SGA settlements must not be at the expense of a wider number of smaller rural sites with the ability to sustain smaller communities across the Vale, especially given the shortfall in numbers as outlined above.

PGD2 – Residential Development Densities

The best use of finite land is set out in PPW and consistent with the setting of the densities as prescribed in policy PGD2. The policy is considered to meet the 3 tests of soundness.

The approach of policy PGD2 is also supported through the proposed density of the site North of Westwinds business park, Fferm Goch in HG4 (4). This allocation that proposes to provide a density of just over 30/ha within Fferm Goch, a minor rural settlement.

SP6 – Housing Requirement

Affordable housing forms an important part of the housing requirement figures of Policy SP6. Whilst the total 122 dwellings proposed under policy HG4 is a relatively small contribution to the overall figures it provides important spatial distribution of homes across the Vale within the rural area.

Given the concerns raised with regard to Policy SP1 there is fear that the affordable housing numbers will not be sufficient to meet need. The site north of Westwinds business park, Fferm Goch has the ability to expand to the south (as per the CS Ref 398) in order to accommodate additional dwellings (both market and affordable dwellings in order to sustain the viability of the site).

SP7 – Affordable Housing Provision

In accordance with Policy SP7 the allocated site HG4(4) at Fferm Goch provides a range of tenures, types and sizes in response to the LHMA, waiting list data and Older persons housing strategy in order to provide for 11 dwelling units and contributing toward the 3,070 affordable requirement to 2036. Changes in the household composition mean more single person and small homes are required, plus older person accommodation for those wishing to downsize and stay in the area.

Please see comments for Policy SP1 / Policy SP2 above regards concern over the proposed housing numbers and supply of affordable homes against demand - this therefore brings the Deliverability of the plan in to question (Test of Soundness 3).

SP8 – Affordable Housing Requirements

Policy SP8 is supported in so far as contributing much needed affordable housing development commensurate with the size of the settlement in which it sits. We are encourage to see reference to the provision of affordable housing to be negotiated on a site by site basis considering evidenced viability fo the development.

The affordable dwellings proposed foster stability in rural areas by allowing a range of households (from single person to

growing families) to stay in their local area.

Policy SP8 states 40% affordable for those developments in primary and minor settlements outside of the SGA yet 50% requirement on affordable housing led allocations in minor rural settlements (also outside of the SGA). This appears inconsistent and penalising those smaller rural sites that will already be more delicately balanced in viability terms by virtue of their limited size of 25 units. Further viability issues covered in other policies (such as SP20, relating to biodiversity, Net Zero and sustainability credentials must (with the required evidence submitted and assessed by the council as stated in Policy SP8) be flexibly reviewed to ensure sites are viable and deliverable as recognised by the Council, there is a danger the stringent requirements, especially for smaller sites, could render those sites unviable in the current climate with rising build costs.

HG4 – Rural affordable housing led sites

The allocation of land north of West Winds Business Park under policy HG4(4) for rural affordable housing led development of 22 units is strongly supported. Then allocation will assist in delivering homes in the rural Vale and contribute to the important stability to the settlement of Fferm Goch to 2036.

The extension of the settlement limit including the site north of West Winds Business Park is supported. The site provides an obvious infill to the small break in the built up area to both the north and south of the site, with the main road running to the eastern boundary of the site.

The inclusion of the site within the settlement of Fferm Goch is logical and in harmony with the existing linear settlement.

The proposal supports the aims of the Local Development Plan and the Welsh Government's commitment to increasing affordable housing supply. By providing for affordable led allocations the policy aligns with the Well-being of Future Generations (Wales) Act 2015 in aiming to promote a healthier, more equal, and cohesive community.

There is concern however surrounding the number of dwellings proposed and if the Plan seeks sufficient dwellings and affordable provision given the predicted need to 2036 shown in the LMHA.

SP13 – Community infrastructure and planning obligations

Policy SP13 demonstrates the importance of community infrastructure in sustaining both the residents well being and economic growth of an area. See also the response to Policy SP2 that refers to the allocation of housing in the rural areas specifically supporting those settlements with local primary school provision.

The viability of developments however must not be compromised in order to ensure delivery of the plan. To see in Policy SP13 that 'development viability' is recognised as a key factor in delivering community infrastructure under planning obligations, is supported. It is recommended that this recognition is replicated in other policies of the LDP in order that the third Test of soundness can be fully met; Deliverability – ensuring the plan is likely to be effective). See comments in relation to Policies SP8/CC1/SP16/CI1.

CI1 – Open Space Provision

Provision of open space in residential developments is supported. HG4(4) promotes open space within the draft allocation.

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

The provisions of SP16 are generally supported as practical measures to ensure important sustainable development is achieved.

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

Provision of Green Infrastructure in residential, and all developments is supported.

HG4(4) retains and enhances existing and will promote green infrastructure on the draft allocation.

The viability of developments however must not be compromised through green infrastructure provision - in order to ensure delivery of the plan. The 'development viability' should therefore be recognised as a key factor in delivering Green Infrastructure. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

Fferm Goch is one of the settlements that remains fully within and covered by the Upper and Lower Thaw Valley Special Landscape Area (SLA). It is noted that in such settlements, while there have been amendments to the identified settlement boundary (inclusion of HG4 (4) rural affordable led housing allocation) this has not affected the SLA designation in these areas. (Background Paper 45; Paragraph 1.16 refers).

The location of the small allocated site HG4(4) is nestled within the settlement of Fferm Goch. It is built up on both the northern and southern boundaries, with the main road running along the eastern boundary. There is no unacceptable harm to the SLA of the Upper and Lower Thaw valley.

The allocation of the site for residential development does not give rise to unacceptable harm to the special qualities and characteristics of the SLA, based on LANDMAP information, continues to be preserved.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

7193 Comment

Document Element: POLICY SP8 - AFFORDABLE HOUSING REQUIREMENTS

Respondent: H Jones, L Sungur and P John [3741]

Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

We encourage to see reference to the provision of affordable housing to be negotiated on a site-by-site basis considering evidenced viability for the development.

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis. Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

The inclusion of the site within the settlement boundary is logical especially when viewed in the context of the linear settlement of Fferm Goch. In addition the site is further suited to development allocation as the northern and southern boundaries are built up and the main road runs along the eastern boundary. A flexible approach is encouraged with regard to the delivery of the dwellings in relation to a variety of factors and policy provisions including the housing needs across the Vale, the limit on numbers of rural affordable led sites in minor rural settlements, viability implications relating to obligations/carbon Zero and sustainability obligations and the potential to extend the allocation if the need for homes requires.

The 3 land owners remain committed to this development and local developers are waiting to deliver the allocation.

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement

• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

The test of soundness for a Local Development Plan (LDP) is a critical component of the planning process to ensure that the plan is prepared in accordance with legal and procedural
requirements. It involves demonstrating that the plan is 'sound' based on three tests set out by the Welsh Government in the Development Plans Manual (Edition 3). These tests have therefore been considered in our representation, the tests include:

• Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)
• Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
• Test 3: Will the plan deliver (i.e. is it likely to be effective?)

SP1 – Sustainable Growth Strategy

The promotion of small scale affordable housing led development outside of the SGA, as proposed by SP1 is important as this provides essential affordable and market homes in the rural locations of the Vale as well as the SGA. Their provision is critical in meeting the area's housing needs, particularly affordable dwellings and supporting rural community stability, and ensuring that all parts of the Vale remain a place where people of all incomes are able to live and thrive during the plan period to 2036 and beyond.

The essence of Policy SP1 is supported, however it is well documented that there is a backlog in delivery of affordable homes and the need for affordable housing in the Vale is exacerbated by the high prevalence of single person households plus households comprising couples with no children, The Vale also has one of the highest affordability pressures in Wales. As stated in the 2023 Local Housing Market Assessment (LHMA) for the Vale of Glamorgan , the median house price in the Vale is around 8 times the median household income, well above the affordability threshold of 4.5 to 5 times household income for borrowing purposes. Private rents have also risen sharply in the area, commonly placing them out of reach for many low-to-middle income households. All of the above place further pressure on the need to deliver affordable homes in the locality.

The LHMA identifies a need for 1,075 affordable homes per year over the next 5 years based on principal projections (or 1,114 based on the RLDP projections). As mentioned previously past delivery rates fall significantly short and therefore a backlog is present, however despite the reported backlog the RLDP only proposes 3,070 (205/annum) affordable dwellings over the plan period to 2036. Despite the growth strategy of policy SP1 and allocations made through the RLDP, the figure of proposed affordable dwelling numbers is concerning as it falls significantly short of the demand evidenced within the most recent evidence of LHMA of 2023.

The housing figures quoted in SP1 indicate 7,890 dwellings (including the 3,070 affordable dwellings) to 2036, however these figures overall are inadequate over the plan period when considered against the 2022 WG household projections. The 2022-based household projections provide an indication of the future number of households, and their composition, based on population projections and assumptions about households from recent censuses. The vale of Glamorgan demonstrates an increase of almost 12% in the number of households between mid-2022 and mid-2032; note this is the highest percentage increase by Local authority in Wales and way above the average for Wales as a whole (that stands at around 7% increase). The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both open market, but particularly Affordable) development across the Vale.

Without targeted allocations outside of the SGA, as outlined in Policy SP1, the gap described above will continue to widen, forcing more residents to leave the area and weakening community cohesion.

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the
RLDP the supporting text of Policy SP2 states:
'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.

• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

sustainable growth. Locating affordable-led developments in areas with existing infrastructure such as primary schools will reduce car dependency, lower carbon emissions, and contribute to the Council's climate change commitments.

Considering the above, the limit on small scale rural affordable housing led developments (RAHLD) to 25 for these settlements is questioned and further flexibility recommended on a case by case basis. It is understood the limit on numbers was imposed due to the existing scale of the settlement in which the RAHLD are located, however those allocations will only likely deliver at 50% affordable and therefore only provide 12.5 (or 13) affordable units as a maximum (note Fferm Goch would provide 11 affordable dwellings on current figures of 22 total dwellings). Given the concerns raised in response to Policy SP1 there remains an issue of whether the numbers proposed in the RLDP can meet the demonstrable need for affordable homes and if there is scope on a RAHLD to sensitively increase unit numbers without any material harm then the policy should be flexible to accommodate this.

Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the range of facilities and services provided in these settlements. It is also supported that these settlements are able to provide affordable led residential development of up to 50 dwellings (delivering 25 affordable units). However the provision of an increased number of units in the Primary Non SGA settlements must not be at the expense of a wider number of smaller rural sites with the ability to sustain smaller communities across the Vale, especially given the shortfall in numbers as outlined above.

PGD2 – Residential Development Densities

The best use of finite land is set out in PPW and consistent with the setting of the densities as prescribed in policy PGD2. The policy is considered to meet the 3 tests of soundness.

The approach of policy PGD2 is also supported through the proposed density of the site North of Westwinds business park, Fferm Goch in HG4 (4). This allocation that proposes to provide a density of just over 30/ha within Fferm Goch, a minor rural settlement.

SP6 – Housing Requirement

Affordable housing forms an important part of the housing requirement figures of Policy SP6. Whilst the total 122 dwellings proposed under policy HG4 is a relatively small contribution to the overall figures it provides important spatial distribution of homes across the Vale within the rural area.

Given the concerns raised with regard to Policy SP1 there is fear that the affordable housing numbers will not be sufficient to meet need. The site north of Westwinds business park, Fferm Goch has the ability to expand to the south (as per the CS Ref 398) in order to accommodate additional dwellings (both market and affordable dwellings in order to sustain the viability of the site).

SP7 – Affordable Housing Provision

In accordance with Policy SP7 the allocated site HG4(4) at Fferm Goch provides a range of tenures, types and sizes in response to the LHMA, waiting list data and Older persons housing strategy in order to provide for 11 dwelling units and contributing toward the 3,070 affordable requirement to 2036. Changes in the household composition mean more single person and small homes are required, plus older person accommodation for those wishing to downsize and stay in the area.

Please see comments for Policy SP1 / Policy SP2 above regards concern over the proposed housing numbers and supply of affordable homes against demand - this therefore brings the Deliverability of the plan in to question (Test of Soundness 3).

SP8 – Affordable Housing Requirements

Policy SP8 is supported in so far as contributing much needed affordable housing development commensurate with the size of the settlement in which it sits. We are encourage to see reference to the provision of affordable housing to be negotiated on a site by site basis considering evidenced viability fo the development.

The affordable dwellings proposed foster stability in rural areas by allowing a range of households (from single person to growing families) to stay in their local area.

Policy SP8 states 40% affordable for those developments in primary and minor settlements outside of the SGA yet 50% requirement on affordable housing led allocations in minor rural settlements (also outside of the SGA). This appears inconsistent and penalising those smaller rural sites that will already be more delicately balanced in viability terms by virtue of their limited size of 25 units. Further viability issues covered in other policies (such as SP20, relating to

biodiversity, Net Zero and sustainability credentials must (with the required evidence submitted and assessed by the council as stated in Policy SP8) be flexibly reviewed to ensure sites are viable and deliverable as recognised by the Council, there is a danger the stringent requirements, especially for smaller sites, could render those sites unviable in the current climate with rising build costs.

HG4 – Rural affordable housing led sites

The allocation of land north of West Winds Business Park under policy HG4(4) for rural affordable housing led development of 22 units is strongly supported. Then allocation will assist in delivering homes in the rural Vale and contribute to the important stability to the settlement of Fferm Goch to 2036.

The extension of the settlement limit including the site north of West Winds Business Park is supported. The site provides an obvious infill to the small break in the built up area to both the north and south of the site, with the main road running to the eastern boundary of the site.

The inclusion of the site within the settlement of Fferm Goch is logical and in harmony with the existing linear settlement.

The proposal supports the aims of the Local Development Plan and the Welsh Government's commitment to increasing affordable housing supply. By providing for affordable led allocations the policy aligns with the Well-being of Future Generations (Wales) Act 2015 in aiming to promote a healthier, more equal, and cohesive community.

There is concern however surrounding the number of dwellings proposed and if the Plan seeks sufficient dwellings and affordable provision given the predicted need to 2036 shown in the LMHA.

SP13 – Community infrastructure and planning obligations

Policy SP13 demonstrates the importance of community infrastructure in sustaining both the residents well being and economic growth of an area. See also the response to Policy SP2 that refers to the allocation of housing in the rural areas specifically supporting those settlements with local primary school provision.

The viability of developments however must not be compromised in order to ensure delivery of the plan. To see in Policy SP13 that 'development viability' is recognised as a key factor in delivering community infrastructure under planning obligations, is supported. It is recommended that this recognition is replicated in other policies of the LDP in order that the third Test of soundness can be fully met; Deliverability – ensuring the plan is likely to be effective). See comments in relation to Policies SP8/CC1/SP16/CI1.

CI1 – Open Space Provision

Provision of open space in residential developments is supported. HG4(4) promotes open space within the draft allocation.

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

The provisions of SP16 are generally supported as practical measures to ensure important sustainable development is achieved.

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

Provision of Green Infrastructure in residential, and all developments is supported.

HG4(4) retains and enhances existing and will promote green infrastructure on the draft allocation.

The viability of developments however must not be compromised through green infrastructure provision - in order to ensure delivery of the plan. The 'development viability' should therefore be recognised as a key factor in delivering Green

Infrastructure. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

Fferm Goch is one of the settlements that remains fully within and covered by the Upper and Lower Thaw Valley Special Landscape Area (SLA). It is noted that in such settlements, while there have been amendments to the identified settlement boundary (inclusion of HG4 (4) rural affordable led housing allocation) this has not affected the SLA designation in these areas. (Background Paper 45; Paragraph 1.16 refers).

The location of the small allocated site HG4(4) is nestled within the settlement of Fferm Goch. It is built up on both the northern and southern boundaries, with the main road running along the eastern boundary. There is no unacceptable harm to the SLA of the Upper and Lower Thaw valley.

The allocation of the site for residential development does not give rise to unacceptable harm to the special qualities and characteristics of the SLA, based on LANDMAP information, continues to be preserved.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

7194 Object

Document Element: POLICY SP8 - AFFORDABLE HOUSING REQUIREMENTS

Respondent: H Jones, L Sungur and P John [3741]

Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

Policy SP8 states 40% affordable for those developments in primary and minor settlements outside of the SGA yet 50% requirement on affordable housing led allocations in minor rural settlements (also outside of the SGA). This appears inconsistent and penalising those smaller rural sites that will already be more delicately balanced in viability terms by virtue of their limited size of 25 units.

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis. Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

The inclusion of the site within the settlement boundary is logical especially when viewed in the context of the linear settlement of Fferm Goch. In addition the site is further suited to development allocation as the northern and southern boundaries are built up and the main road runs along the eastern boundary. A flexible approach is encouraged with regard to the delivery of the dwellings in relation to a variety of factors and policy provisions including the housing needs across the Vale, the limit on numbers of rural affordable led sites in minor rural settlements, viability implications relating to obligations/carbon Zero and sustainability obligations and the potential to extend the allocation if the need for homes requires.

The 3 land owners remain committed to this development and local developers are waiting to deliver the allocation.

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations

• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

The test of soundness for a Local Development Plan (LDP) is a critical component of the planning process to ensure that the plan is prepared in accordance with legal and procedural
requirements. It involves demonstrating that the plan is 'sound' based on three tests set out by the Welsh Government in the Development Plans Manual (Edition 3). These tests have therefore been considered in our representation, the tests include:

• Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)
• Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
• Test 3: Will the plan deliver (i.e. is it likely to be effective?)

SP1 – Sustainable Growth Strategy

The promotion of small scale affordable housing led development outside of the SGA, as proposed by SP1 is important as this provides essential affordable and market homes in the rural locations of the Vale as well as the SGA. Their provision is critical in meeting the area's housing needs, particularly affordable dwellings and supporting rural community stability, and ensuring that all parts of the Vale remain a place where people of all incomes are able to live and thrive during the plan period to 2036 and beyond.

The essence of Policy SP1 is supported, however it is well documented that there is a backlog in delivery of affordable homes and the need for affordable housing in the Vale is exacerbated by the high prevalence of single person households plus households comprising couples with no children, The Vale also has one of the highest affordability pressures in Wales. As stated in the 2023 Local Housing Market Assessment (LHMA) for the Vale of Glamorgan , the median house price in the Vale is around 8 times the median household income, well above the affordability threshold of 4.5 to 5 times household income for borrowing purposes. Private rents have also risen sharply in the area, commonly placing them out of reach for many low-to-middle income households. All of the above place further pressure on the need to deliver affordable homes in the locality.

The LHMA identifies a need for 1,075 affordable homes per year over the next 5 years based on principal projections (or 1,114 based on the RLDP projections). As mentioned previously past delivery rates fall significantly short and therefore a backlog is present, however despite the reported backlog the RLDP only proposes 3,070 (205/annum) affordable dwellings over the plan period to 2036. Despite the growth strategy of policy SP1 and allocations made through the RLDP, the figure of proposed affordable dwelling numbers is concerning as it falls significantly short of the demand evidenced within the most recent evidence of LHMA of 2023.

The housing figures quoted in SP1 indicate 7,890 dwellings (including the 3,070 affordable dwellings) to 2036, however these figures overall are inadequate over the plan period when considered against the 2022 WG household projections. The 2022-based household projections provide an indication of the future number of households, and their composition, based on population projections and assumptions about households from recent censuses. The vale of Glamorgan demonstrates an increase of almost 12% in the number of households between mid-2022 and mid-2032; note this is the highest percentage increase by Local authority in Wales and way above the average for Wales as a whole (that stands at around 7% increase). The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both open market, but particularly Affordable) development across the Vale.

Without targeted allocations outside of the SGA, as outlined in Policy SP1, the gap described above will continue to widen, forcing more residents to leave the area and weakening community cohesion.

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the
RLDP the supporting text of Policy SP2 states:
'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

sustainable growth. Locating affordable-led developments in areas with existing infrastructure such as primary schools will reduce car dependency, lower carbon emissions, and contribute to the Council's climate change commitments.

Considering the above, the limit on small scale rural affordable housing led developments (RAHLD) to 25 for these settlements is questioned and further flexibility recommended on a case by case basis. It is understood the limit on numbers was imposed due to the existing scale of the settlement in which the RAHLD are located, however those allocations will only likely deliver at 50% affordable and therefore only provide 12.5 (or 13) affordable units as a maximum (note Fferm Goch would provide 11 affordable dwellings on current figures of 22 total dwellings). Given the concerns raised in response to Policy SP1 there remains an issue of whether the numbers proposed in the RLDP can meet the demonstrable need for affordable homes and if there is scope on a RAHLD to sensitively increase unit numbers without any material harm then the policy should be flexible to accommodate this.

Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the range of facilities and services provided in these settlements. It is also supported that these settlements are able to provide affordable led residential development of up to 50 dwellings (delivering 25 affordable units). However the provision of an increased number of units in the Primary Non SGA settlements must not be at the expense of a wider number of smaller rural sites with the ability to sustain smaller communities across the Vale, especially given the shortfall in numbers as outlined above.

PGD2 – Residential Development Densities

The best use of finite land is set out in PPW and consistent with the setting of the densities as prescribed in policy PGD2. The policy is considered to meet the 3 tests of soundness.

The approach of policy PGD2 is also supported through the proposed density of the site North of Westwinds business park, Fferm Goch in HG4 (4). This allocation that proposes to provide a density of just over 30/ha within Fferm Goch, a minor rural settlement.

SP6 – Housing Requirement

Affordable housing forms an important part of the housing requirement figures of Policy SP6. Whilst the total 122 dwellings proposed under policy HG4 is a relatively small contribution to the overall figures it provides important spatial distribution of homes across the Vale within the rural area.

Given the concerns raised with regard to Policy SP1 there is fear that the affordable housing numbers will not be sufficient to meet need. The site north of Westwinds business park, Fferm Goch has the ability to expand to the south (as per the CS Ref 398) in order to accommodate additional dwellings (both market and affordable dwellings in order to sustain the viability of the site).

SP7 – Affordable Housing Provision

In accordance with Policy SP7 the allocated site HG4(4) at Fferm Goch provides a range of tenures, types and sizes in response to the LHMA, waiting list data and Older persons housing strategy in order to provide for 11 dwelling units and contributing toward the 3,070 affordable requirement to 2036. Changes in the household composition mean more single person and small homes are required, plus older person accommodation for those wishing to downsize and stay in the area.

Please see comments for Policy SP1 / Policy SP2 above regards concern over the proposed housing numbers and supply of affordable homes against demand - this therefore brings the Deliverability of the plan in to question (Test of Soundness 3).

SP8 – Affordable Housing Requirements

Policy SP8 is supported in so far as contributing much needed affordable housing development commensurate with the size of the settlement in which it sits. We are encourage to see reference to the provision of affordable housing to be negotiated on a site by site basis considering evidenced viability fo the development.

The affordable dwellings proposed foster stability in rural areas by allowing a range of households (from single person to growing families) to stay in their local area.

Policy SP8 states 40% affordable for those developments in primary and minor settlements outside of the SGA yet 50% requirement on affordable housing led allocations in minor rural settlements (also outside of the SGA). This appears inconsistent and penalising those smaller rural sites that will already be more delicately balanced in viability terms by virtue of their limited size of 25 units. Further viability issues covered in other policies (such as SP20, relating to biodiversity, Net Zero and sustainability credentials must (with the required evidence submitted and assessed by the council as stated in Policy SP8) be flexibly reviewed to ensure sites are viable and deliverable as recognised by the Council, there is a danger the stringent requirements, especially for smaller sites, could render those sites unviable in the current climate with rising build costs.

HG4 – Rural affordable housing led sites

The allocation of land north of West Winds Business Park under policy HG4(4) for rural affordable housing led development of 22 units is strongly supported. Then allocation will assist in delivering homes in the rural Vale and contribute to the important stability to the settlement of Fferm Goch to 2036.

The extension of the settlement limit including the site north of West Winds Business Park is supported. The site provides an obvious infill to the small break in the built up area to both the north and south of the site, with the main road running to the eastern boundary of the site.

The inclusion of the site within the settlement of Fferm Goch is logical and in harmony with the existing linear settlement.

The proposal supports the aims of the Local Development Plan and the Welsh Government's commitment to increasing affordable housing supply. By providing for affordable led allocations the policy aligns with the Well-being of Future Generations (Wales) Act 2015 in aiming to promote a healthier, more equal, and cohesive community.

There is concern however surrounding the number of dwellings proposed and if the Plan seeks sufficient dwellings and affordable provision given the predicted need to 2036 shown in the LMHA.

SP13 – Community infrastructure and planning obligations

Policy SP13 demonstrates the importance of community infrastructure in sustaining both the residents well being and economic growth of an area. See also the response to Policy SP2 that refers to the allocation of housing in the rural areas specifically supporting those settlements with local primary school provision.

The viability of developments however must not be compromised in order to ensure delivery of the plan. To see in Policy SP13 that 'development viability' is recognised as a key factor in delivering community infrastructure under planning obligations, is supported. It is recommended that this recognition is replicated in other policies of the LDP in order that the third Test of soundness can be fully met; Deliverability – ensuring the plan is likely to be effective). See comments in relation to Policies SP8/CC1/SP16/CI1.

CI1 – Open Space Provision

Provision of open space in residential developments is supported. HG4(4) promotes open space within the draft allocation.

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

The provisions of SP16 are generally supported as practical measures to ensure important sustainable development is achieved.

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

Provision of Green Infrastructure in residential, and all developments is supported.

HG4(4) retains and enhances existing and will promote green infrastructure on the draft allocation.

The viability of developments however must not be compromised through green infrastructure provision - in order to ensure delivery of the plan. The 'development viability' should therefore be recognised as a key factor in delivering Green Infrastructure. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

Fferm Goch is one of the settlements that remains fully within and covered by the Upper and Lower Thaw Valley Special Landscape Area (SLA). It is noted that in such settlements, while there have been amendments to the identified settlement boundary (inclusion of HG4 (4) rural affordable led housing allocation) this has not affected the SLA designation in these areas. (Background Paper 45; Paragraph 1.16 refers).

The location of the small allocated site HG4(4) is nestled within the settlement of Fferm Goch. It is built up on both the northern and southern boundaries, with the main road running along the eastern boundary. There is no unacceptable harm to the SLA of the Upper and Lower Thaw valley.

The allocation of the site for residential development does not give rise to unacceptable harm to the special qualities and characteristics of the SLA, based on LANDMAP information, continues to be preserved.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

5125 Comment

Document Element: HG4 - RURAL AFFORDABLE HOUSING LED SITES

Respondent: Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]

Summary:

Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.

Paragraph 6.137 of the plan states:
"Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary."

The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.

These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to ensure effective delivery.

Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.
Without prejudice to the Minster's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.
National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.
After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:
Annex 1 – General Conformity with Future Wales
• No significant concerns
Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)
• Spatial Strategy and Primary Settlements
• Housing and Economic Growth Levels – Regional Collaboration
• Maximising Affordable Housing Provision
• Delivery & Implementation – General
• Gypsy and Travellers
• Renewable Energy
• Minerals
• Best and Most Versatile Agricultural Land (BMV)
• Welsh Language

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.
My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.

Yours sincerely,
Neil Hemington
Chief Planner Welsh Government

Annex 1 - Statement of General Conformity
The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).
There is a joint position statement on the relationship between Bridgend, Cardiff and the Vale of Glamorgan (BP20A), which considers population growth, migration patterns, housing completions, employment characteristics, demographics, commuting and transport links between the three adjoining authorities. The Welsh Government supports the principle of this work which demonstrates how change in the Vale of Glamorgan relates and complements growth in adjoining local authorities. This approach illustrates a good mechanism for other local authorities to follow.
Reasons
Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the climate change and biodiversity emergencies, making the best use of resources.
Policy 1 and Policy 33 of Future Wales states that Cardiff, Newport, and the Valleys will be the main focus for growth and investment in the region. The strategic diagram (p163) also identifies the Vale of Glamorgan within the National Growth Area. The Vale of Glamorgan RLDP, specifically BP20A, provides robust evidence on the interrelationship and key issues with adjoining authorities, including their interaction and how they have shaped and influenced the scale/location of growth in the RLDP. This is set out in the three Joint Position Statements (JPSs).
BP45 'Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR), May 2024, provides further evidence on how the scale of growth indicated for the region has shaped the scale of future economic growth within the Vale of Glamorgan. This results in a higher level of employment growth in the Vale of Glamorgan primarily to increase self-containment and reduce out-flows to adjoining urban areas. Two key areas for future economic growth are identified at Cardiff Airport/Bro Tathan Enterprise Zone and Aberthaw Power Station.
The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.
On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):
Policy 1: Where will Wales grow
Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 6: Town Centre First
Policy 10: International Connectivity – Cardiff Airport
Policy 12 Regional Connectivity
Policy 33: National Growth Area – Cardiff, Newport and the Valleys
Policy 36: South-East Metro
Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.
With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements

The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.

The Level of Growth - Homes and Jobs

The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).

Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.

BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.

Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.

The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level of growth proposed in the plan.

We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.

The Welsh Government notes that BP0A identifies small and large windfalls, based on historic trends of 53/yr and 80/yr respectively. Also, the large windfalls are not included in the first two years of the trajectory, as per the DPM. A non-delivery allowance of 5% is identified, which reflects local characteristics in the Vale of Glamorgan. A flexibility allowance of 9.8% has been factored into the provision. The Welsh Government supports this approach, although whilst Appendix 1 contains a housing trajectory, there is no table to mirror that of Table 21, DPM. This should be included in Appendix 1. 6

Jobs: The Council's 10-year dwelling-led growth option results in a requirement for 4,875 new jobs (325 p/a) over the plan period. This broadly aligns with the projected growth for 5,338 (355 p/a) new jobs in the Employment Land Review (BP12) and as set out in Policy SP14.

The level of employment growth proposed (5,338 jobs) over the plan period is below the target in the currently adopted plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.

In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of

homes and jobs proposed in the plan, which is in general conformity with Future Wales.
Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.
The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.
Paragraph 6.137 of the plan states:
"Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary."
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?
Affordable Housing Exceptions Sites
Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.
Employment Land
The Council's Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).
Delivery and Implementation
PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.
The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.
The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have 'rolled over' from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.
The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters.
It will be for the Council to justify deliverability supported by robust financial viability.
Gypsy and Travellers
The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for

11 pitches over the plan period up to 2036, of which 9 pitches are 'immediate' by 2026. WG note that 4 pitches have since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

Policy SP9 identifies a site at Llangan (0.76Ha) to accommodate the 7 pitches needed. It will be for the Council to demonstrate the appropriate site selection assessment process has been followed and that the site complies with requirements in PPW (4.2.35), Circular 005/2018 (paragraph 35) any relevant guidance and the DPM (5.80-5.85) to allocate a deliverable site in the plan period. The views of the relevant statutory bodies must also be agreed with no outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.

Renewable Energy

Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Could the Council provide an update on alternative options for a DHN in Barry?

It is welcome that the Renewable Energy Assessment (REA) has considered BMV policy, specifically for solar PV, and use of the Predictive ALC Map. The assessment has only considered non-BMV land (Subgrade 3b, Grade 4 and 5). The assessment would benefit from referencing the clarification provided in the DCPO letter of 1st March 2022 in respect of solar PV and BMV agricultural land for completeness.

The study identifies that in the Vale of Glamorgan solar development is more suitable than wind energy because of the flight path of aircraft in the south of the County Borough. However, there are some opportunities for wind sites, but these are likely to be small (<10MW) where aviation risks are lower and there is some grid access. Conversely, there are large expanses of land suitable for solar areas (>10MW) to the West of the County Borough, where there is little existing development. The study identifies 20 large-scale solar areas but recognises that grid constraints may impact the ability of sites to come forward.

Solar and wind search areas (where appropriate) below the 10MW Developments of National Significance (DNS) have been identified (Policy CC3). The plan also includes a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW (Policy CC4). Policy CC3 makes reference to adhering to the criteria in Policy CC4. However, would it not be the case that if search areas have been identified in Policy CC3 have they not already met the criteria? If they would not, should they be identified in the first place? Clarity would be beneficial. The Welsh Government supports the approach but seeks clarity on the point raised.

The Welsh Government notes the proposed search areas for wind energy near Morfa Ystrad Owen/Nant Rhydhalog, according to the Peatlands of Wales Evidence Score Map, the search area includes areas of peatland (Evidence Score 4). The site is also a SINC. This raises concerns as to how the inclusion of this search areas meets the policy test in PPW 6.4.15, 1a and 1b (Stepwise) regarding avoidance of irreplaceable peatland habitats and PPW 6.4.34.

Policy CC4 refers to Developments of National Significance (DNS) in 6.344 and 6.346. This should now refer to Strategic Infrastructure Projects (SIP) which replaced DNS.

Minerals

The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in the Vale of Glamorgan. The Welsh Government policy clarification letter (dated 11 November 2021) identifies a surplus of 1.68mt of crushed rock. As there is a surplus of crushed rock reserves and a lack of sand and gravel production in the Vale, no specific allocations are required in the replacement plan. It is unclear whether a Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region been agreed, or does the latest Position Statement (July 2022) explain how any shortfall will be met across 9

the region, particularly for crushed rock, of which the Vale has a surplus? Clarification would be beneficial.

BMV Agricultural Land

The Welsh Government has engaged with the Council for land quality advice, survey advice and ALC survey validation for candidate sites. The LPA has produced a specific topic paper on BMV policy application. BP23A. The Deposit RLDP allocates 188 hectares of housing land, 5.62 ha is identified as BMV land (under 3% of total housing allocations). The RLDP:

- Has sought to avoid BMV land wherever possible;
- Uses the Predictive ALC Map as a core evidence layer to inform: The spatial strategy;
- Settlement hierarchy decisions; and
- Candidate site assessments.
-
- Directs strategic growth to areas with least BMV land
- Removes or avoids allocations where BMV impacts were significant or unjustified.
- Quantifies total BMV loss and demonstrates it is minimal (5.62ha) and proportionate at plan level.
- Applies a sequential approach through: Preference for brownfield and non-BMV sites;
- Replacement of higher-BMV sites with lower-grade alternatives where possible.
-
- Requires site-specific ALC surveys to verify actual land quality before allocation.
- Demonstrates that allocated BMV land is: Often small, fragmented, or constrained;
- Sometimes previously disturbed or incapable of being farmed differently from surrounding lower-grade land; and
- Necessary to deliver the Plan's housing strategy where reasonable alternatives are unavailable.
-

In conclusion, the Welsh Government consider the Authority has demonstrated a sensible and pragmatic approach to

considering BMV loss in the context of national planning policy, and on that basis no objection is offered.
Green Infrastructure
Policy SP19 should explicitly reference the need for development to be accompanied by a Green Infrastructure Statement.
PPW12 requires decision makers to apply the step wise approach to GI, with enhancement secured at every stage where possible, there is no distinction made between the quality of the GI assets – the qualification in the policy statement that states proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure should be redrafted to remove the quality reference. The need to avoid an impact in the first instance should also be explicitly incorporated into the policy.
Criterion 1 (Policy SP20) should be redrafted – the stepwise approach in PPW 12 6.4.15 1a - does not distinguish between relative ecological value – the avoidance step applies to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.
Welsh Language
There is limited reference to the Welsh language in the plan, either potential adverse impacts arising through development, or mechanisms via a policy framework to support and grow the use of the language. There are references to a number of Welsh-medium schools (3.26) and the increase in the number of people able to speak Welsh according to the 2011 census (3.52) but there is no mention of the authority's Welsh Language Strategy or promoting or cross-referencing to the aims of 10

Cymraeg 2050: A million Welsh-speakers. Paragraph 6.81 of the plan refers to development north west of Barry:
“Land at North West Barry is allocated for a residential development of up to 376 dwellings and public open space. The site is in a sustainable location on the edge of the Barry, a key settlement, in a location that is well served by services and facilities, including a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium and Church in Wales) and two high schools (English and Welsh Medium) all located in reasonable walking distance. There is an active travel route along Port Road West, bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry. Barry station is 1.3 miles from the site entrance.”
There is no mention that the Council want to undertake a Welsh Language Impact Assessment (WLIA) so there appears no attempt to measure the impact on the Welsh schools resulting from housing development? Could the Council clarify if such implications have already been covered in the WLIA for the plan, ISA, or are any specific policies necessary?

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/syf

6026 Object

Document Element: HG4 - RURAL AFFORDABLE HOUSING LED SITES

Respondent: Barratt Redrow Homes [2669]

Agent: Lichfields

Summary:

The proposed 25-dwelling cap for Minor Rural Settlements is considered unjustified and should allow expansion where viable. Flexibility in dwelling numbers and market housing mix is necessary to meet local demand and ensure the financial viability of affordable housing delivery.

The Council needs to ensure that it does not undermine site viability by being overly prescriptive on market (and affordable) dwelling mix.

Full text:

The allocation of 'Land to the East of Colwinston' for residential development as a Rural Affordable Housing Led Site by Policy HG4(1) is supported by Barratt David Wilson Redrow (South Wales) Ltd. The site is free from any major constraints and is suitable for development, demonstrated by the successful Redrow development adjacent. The allocation assists in delivering the RLDP vision, in particular for the delivery of homes which caters for all, including affordable homes. As explained in our representations to Policy SP1 and SP2 above, the delivery of housing at the Primary and Minor Rural Settlements is essential to ensuring the housing needs of the individual HMAs (and also, the housing needs of VoG) are met during the RLDP period.

'Land to the East of Colwinston' has limited environmental constraints and as set out in our representations to Policy SP2 above, the site area is capable of being expanded to deliver greater dwelling numbers to support the delivery of the identified need for affordable housing in the Llandow HMA during the RLDP period.

The upper limit of 25 dwellings for Minor Rural Settlements allocations is unevidenced and does not align with the need identified in Colwinston. Given the identified need for housing and affordable housing as set out in our comments to Policy SP1, allocated Rural Affordable Housing-Led Sites that have limited constraints (e.g. Allocation HG4(1)) should be allowed to be expanded and accommodate further dwelling numbers should it be desirable and viable to do so.

Policy HG4 also states that "…In addition, the Council will require developers to provide a mix of market housing that will contribute to the specific housing market needs of the community. Applicants will need to demonstrate how both the market and affordable housing provides for the local housing needs of community in terms of tenure, type and size of dwellings so that a range of housing is delivered to meet the needs of different groups in the local community."

The RLDP seeks a high proportion of affordable homes as well as ambitious policies for net zero carbon operational homes. If these policies are going to be met it is essential that the mix of dwellings on the open market element is of a sufficient value to make the Council's policy aspirations deliverable.

Change suggested by respondent:

"The following sites are allocated as affordable housing led sites where there will be a requirement for the provision of a minimum 50% affordable housing to meet the affordable housing needs of the local community."

The removal of the arbitrary upper limit on maximum dwelling numbers for allocations in Minor Rural Settlements and the removal of policy restrictions on open market tenure, type and size will ensure that Policy HG4 meets the third test of soundness (Will the Plan deliver?) and will assist in the delivery of the site.

Sound: No

Attachments: None

6822 Object

Document Element: HG4 - RURAL AFFORDABLE HOUSING LED SITES

Respondent: Mr Ian Fairweather [1225]

Agent: Boyer Planning

Summary:

There is no objection in principle to Policy HG4, but there is an objection to the fact that there is no development in St Nicholas (despite it being sustainably located on the A48).

Full text:

The Spinney, St Nicholas (Site Ref: 460)
Boyer have prepared the following representation on behalf of Mr Fairweather in response to the current Vale of Glamorgan Replacement Local Development Plan (RLDP) 2021-2036 Deposit Plan Consultation.

A summary of our main representations is as follows:
• Significant concern is raised regarding the lack of residential allocations within the Minor Rural Settlements, in particular St Nicholas.
• Concern regarding the overall housing requirement and the need for an increased flexibility allowance.
• Questions asked regarding the spatial distribution and the lack of other allocations to provide a range and choice of housing.
• Confirmation of the limited constraints for The Spinney, St Nicholas (Site Ref: 460).
• Review of the Candidate Site Assessment; and
• Need to review the Settlement Boundary of St Nicholas.

SP1: Sustainable Growth Strategy
Whilst Policy SP1 outlines the housing delivery requirement (addressed under the response to SP6), the main concern for Mr Fairweather is the proposed primary focus of housing growth within the Vale being within the Strategic Growth Area. Whilst it is understood and supported by Mr Fairweather that new housing developments would be concentrated in locations which are served by existing public transport routes and provide the opportunity to enhance sustainable transport connectivity, it is shortsighted to concentrate this growth specifically along the railway line. The justification

being that those settlements identified as being 'Outside of the Strategic Growth Area' – including St Nicholas, are equally as important as those within. St Nicholas is a sustainable location and located on an important public transport route (A48) and is well served by bus transport.

The principle of locating development at sustainable settlement is supported, however Mr Fairweather considered that limiting development at suitable settlements outside the Strategic Growth Area is not the correct approach and that greater flexibility is required to deliver the housing need. Currently under Policies HG1 and HG4, the only allocations in any Minor Rural Settlements amount to 122 dwellings in total (excluding any from St Nicholas). This also needs to be considered in the context of the 1,303 dwellings expected from large and small windfall developments. Clearly there is a requirement to provide further allocations in sustainable Minor Rural settlements identified as being 'Outside of the Strategic Growth Area' – namely St Nicholas.

In context of above, Mr Fairweather strongly recommends that appropriate consideration is given to the widening of the Strategic Growth Areas to include St Nicholas as a sustainable settlement which is capable of accommodating a new allocation at The Spinney (Site Ref: 460).

SP2: Settlement Hierarchy
Mr Fairweather previously supported the identification of St Nicholas as a Minor Rural Settlement and acknowledged its capacity to accommodate proportionate and sustainable growth, particularly given its accessibility and relationship with Cardiff to the east and access to Bridgend to the West. The Deposit Plan retains St Nicholas within the Minor Rural Settlement tier, however, does confirm that the settlement is outside the Strategic Growth Area.

Whilst the overarching principle of directing growth to the most sustainable settlements is supported, the Plan does not clearly demonstrate why settlements that are well connected and functionally related to larger centres, such as St Nicholas, should be subject to such constrained growth.

In this context, Mr Fairweather highlights Paragraph 3.10 which indicates that Minor Rural Settlements provide an 'important range of services and facilities that play a functional role in meeting some of the basic needs of residents within rural areas, reducing the need to travel'.
Building upon this, Policy SP2 does highlight that 'Minor Rural Settlements identified will be limited to the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments'.

Furthermore, the supporting text to Policy SP2 (Paragraph 6.17) confirms that 'those settlements that are considered to have sufficient population, services, and facilities to accommodate small scale growth without it having a detrimental impact on their existing character and local environment'.

This all buildings upon the identified importance of Minor Rural Settlements within the Preferred Strategy which outlined in Paragraph 6.50 that it is 'essential for the LDP to balance the growth in a way that supports the need of rural communities' and whilst it is evident that within these settlements 'general market housing will be limited to opportunities including infill' (Paragraph 6.51), the enabling of an element of 'open market housing will provide opportunities for the delivery of affordable housing reflecting the aspirations of rural communities to sustain their housing needs' (Paragraph 6.51). This importance of Minor Rural Settlements needs to be carried more strongly forward in the Deposit Plan.

Moreover, the evidence base does not sufficiently justify the degree of restriction now applied, nor does it explain why proportionate additional growth in appropriate Minor Rural Settlements would undermine the spatial strategy. As drafted, the policy risks limiting flexibility in the distribution of housing across the Vale. Accordingly, it is considered that the approach to St Nicholas under Policy SP2 is not justified.

Clearly there continues to be a disconnect between the identified role and function of St Nicholas, which is supported, and the actual ability to deliver the appropriate range and choice of dwellings in the rural settlements. For example, The Spinney, St Nicholas (Site Ref: 460) is considered to naturally round-off the existing boundary, enclosing the envelope of development, without encroaching or sprawling beyond the existing line of built form, in a sustainable location which can accommodate an appropriate allocation.

SP6: Housing Requirement
As per Mr Fairweather's previous comments to the Preferred Strategy, the concerns regarding a need for a higher housing level and the need for development to be appropriate placed in sustainable allocations in a settlement in which people want to live is still relevant.

Currently Policy SP6 establishes the overall housing requirement and applies a 10% flexibility allowance. The Policy suggests that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes and this will be delivered by:
• 3,837 dwellings from the existing land supply
• 3,520 dwellings on allocated sites
• 1,303 dwellings from large and small windfall developments

As per previous representations, Mr Fairweather considers that it's important to take account of recent guidance provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan. For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
More recently in Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery.
Applying the same approach to other current Local Development Plans, it is evident that a flexible housing allowance above the current 10% threshold will be required. Having reviewed the Council's evidence base Mr Fairweather considered that a minimum allowance of 15% would be reflective of the County's growth aspirations and would seek an additional circa 400 dwellings (equating to a housing requirement of 9,074 dwellings inclusive of the 15% flexibility).

To accommodate this increased in flexibility allowance and over all housing numbers, it should be outlined that smaller sites typically deliver more quickly, are less infrastructure-dependent, and increase build-out rates through diversification. The Spinney represents precisely the type of deliverable site that should form part of an enhanced flexibility allowance.

Policy SP6 should therefore be amended to increase the flexibility margin to up to 15%, with consequential allocation of additional small and medium-sized sites.
HG1: Housing Allocations Table 3 spatial distribution
Mr Fairweather does not comment on any of the proposed housing allocations, however, does highlight that the delivery in incumbent upon a number of larger strategic sites, and that to allow a greater range and choice then smaller allocations in the Minor Rural Settlements. Only 161 units are proposed on smaller allocated sites, equating to approximately 7% of newly allocated supply.
In the context of the above, there remains significant concern that the spatial strategy continues to exclude allocations within Minor Rural Settlements, including St Nicholas.

The Plan recognises that Minor Rural Settlements provide an important range of services and facilities and play a functional role in meeting the needs of residents within rural areas. It further acknowledges that it is essential for the LDP to balance growth in a way that supports rural communities. Whilst general market housing is described as being limited to infill opportunities, the Plan also recognises that enabling an element of open market housing provides opportunities for the delivery of affordable housing and helps sustain rural communities.

There is therefore a clear disconnect between the identified role and function of settlements such as St Nicholas and the absence of any allocated sites (excluding the affordable led schemes under Policy HG4) capable of delivering an appropriate range and choice of dwellings. The strategy effectively restricts development to windfall and infill, without positively identifying opportunities that would logically consolidate and strengthen the settlement.

This approach is inconsistent with the settlement's accessibility and functional role. St Nicholas is:
• Well connected to the A48 strategic highway network.
• Served by bus routes within close proximity to the site.
• Within commuting distance of Cardiff and Cowbridge.
• A sustainable and established residential community.

Land adjoining The Spinney, St Nicholas (Site Ref: 460) represents a contained and sustainable opportunity that naturally rounds off the existing settlement boundary. The site encloses the envelope of development without encroaching into open countryside or extending beyond the established line of built form. It is well related to existing services and infrastructure and is capable of accommodating a modest allocation consistent with the scale and character of the village.

A proportionate allocation at this location would align with the stated objectives of supporting rural communities, enabling a mix of market and affordable housing, and providing genuine choice within Minor Rural Settlements. The continued absence of such allocations undermines the internal consistency of the spatial strategy.
Furthermore, the strategy places substantial emphasis on rail-based corridors. Whilst development near rail infrastructure is supported in principle, sustainable growth should not be exclusively rail-led. Strategic highway connectivity and bus accessibility also represent legitimate and sustainable locational advantages.

The complete absence of allocations in Minor Rural Settlements creates an imbalance in distribution and limits housing choice. A modest allocation at The Spinney would represent proportionate growth consistent with the scale and character of the settlement.
HG4 – Affordable Housing Allocations

It is recognised that Policy HG4 does allocate development within some Minor Rural Settlements, but in the context of them being affordable housing led sites where there will be a requirement for the provision of a minimum 50% affordable housing to meet the affordable housing needs of the local community. Mr Fairweather has no objection in principle to this but does object to the fact that there is no development in St Nicholas (despite it being sustainably located on the A48).

Furthermore, The Spinney, St Nicholas (Site Ref: 460) proposes a 40% affordable housing provision which accords with Policy SP8 of the Deposit Plan. Should the Authority consider that the site is suitable for allocation under Policy HG4 then the provision can be amended to 50% to accord with the policy.

Candidate Site Response: The Spinney, St Nicholas (Site Ref: 460)
From a review of the Background Paper (BP18 a) - Candidate Site Assessment at Preferred Strategy Stage, we are aware that the candidate site The Spinney, St Nicholas (Site Ref: 460) has not progressed beyond Stage 2: Detailed Site Assessment: Site Characteristics and Physical Constraints.

The justification provided states that 'The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area'. Whilst this is disputed and it is considered that the site should have progressed, it is important to highlight that of all the Candidate Sites within St Nicholas, The Spinney has the least issues raised.

Other sites within the assessment raised concerns regarding Best and Most Versatile Land, intrusion into the open countryside and the loss of a sites identified as providing important views. Ultimately, Site Ref: 460, is clearly the most appropriate site for any development within St Nicholas and with limited constraints raised.
Turning to the reasons for not taking the site forward, the following is reiterated in the context of the impact on the character and setting of the Conservation Area.

Conservation Area Impact
St Nicholas is described in the Conservation Area Appraisal and Management Plan as 'a low density, linear village located on the A48' and the candidate site is located towards the west of the village and lies partially within the current Conservation Area boundary. The Authority will be aware that the Conservation Area has been amended over the years to its current illogical designation regarding the Paddock area, similar to that of the Settlement Boundary.

The development of the Candidate Site is a clearly a logical and sensible infill development, which would have limited impact upon the Conservation Area. The majority of the site is already hidden from the A48 via mature vegetation and existing boundary features, and any proposed development would maintain this approach and minimise the visual appearance on the Conservation Area.
Listed buildings and other historic buildings of special interest are identified in the Conservation Area Appraisal as 'County Treasures'. These are situated at the heart of the Conservation Area. The buildings and their settings establish a scale and density for the historic area of the village to the south of St Nicholas' Church.

More modern development, away from the centre of the village at Ger-y-Llan to the northeast, Dyffryn Close to the southeast and Old Rectory Drive to the west are suburban in character with larger houses and generous gardens. These are all excluded from the Conservation Area and represent development at a lower density than the historic core of the village.

Whilst only a part of the Candidate Site is located within the Conservation Area, it has to be seen in the context of an appropriate infill site that links the southern part of the village with the more modern suburban type of development at Old Rectory Drive to the west. More significantly, the site provides an opportunity for a development to make a positive contribution to the character and appearance of the Conservation Area as well as respect or enhance the special architectural or historic interest.

This can be achieved by providing a new front boundary to the site and houses with gardens, of the type identified in the Conservation Area Appraisal and Management Plan that help define the character of the village. Whilst the Candidate Site extends to the A48, this is to allow the appropriate minimal access junction, whilst the majority of the generous grass verge will be retained, meaning that development will be clearly set back a considerable distance from the road and the opposite pavement.

Thus, the development will be totally screened when travelling along the A48 and is therefore not considered to affect the views to the north of the site. The development will complement and enhance the character of the rural and built environment surrounding the site.
In line with the objectives of the St Nicholas Conservation Appraisal and Management Plan, the boundary treatments proposed will be sympathetic and in keeping with the surrounding area, such that they do not detract from the historic assets and desired lines of view. Again, whilst detailed design has not yet been progressed, any boundary treatments proposed will avoid the use of stained close boarded timber fencing, over-elaborate modern metal railings and gates. It is reiterated that the building line for the front of the development will not encroach any further forward that the existing boundary and will be designed to be innkeeping and not detract from the existing character of the Conservation Area. Moreover, the layout of the site has been designed in such a way that the spaciousness and green infrastructure is retained and enhanced from a redundant Paddock.

Furthermore, the characteristics that give the Conservation Area its special interest, as identified in the Conservation Area Appraisal and Management Plan have been used as references for the design of the illustrative site layout.

The proposal is to use local materials and design details designed to preserve or enhance the special interest of the Conservation Area. Limestone laid as rubble external walling, slate roofs and roadside walls of varying sizes predominate. More modern houses in the area are rendered and painted white. This, according to the Conservation Area Appraisal gives 'some cohesiveness [to the area] despite their modern details'.

Elsewhere in the appraisal the village is described as having a 'rural character', a character that is reinforced by the existence of mature trees, singularly or in groups and simple pavements with narrow stone curves. The use of modern railings or timber fences are considered to be detrimental to the historic character of the conservation area.

Given the sites relationship with the Conservation Area, the proposal has been designed in to ensure that the development endeavours to protect, preserve and enhance the character of the area.

The site layout has been designed to avoid having the appearance of a suburban estate by providing a range of house types on plots that vary in size thereby maintaining the open structure of the conservation area as described. Furthermore, the existing boundaries to the east and west, which are subject to TPOs, will be retained and enhanced and not detract from the character of the Conservation Area.

The site marks a transition point between the western end of the linear historic core of the village and the lower density development at Old Rectory Drive.
The landscape proposals have been designed to include sustainable drainage, and the tree planting reflects the isolated trees or groups of trees referred to in the Conservation Area Appraisal as significant areas of character.

The illustrative site layout represents an appropriate scale of development and an efficient use of land and as such the proposed development will not have any detrimental impact upon the Conservation Area.
Deposit Plan Amendments
Settlement Boundary

Given the above and the further assessment below, the strong preference would be for the site to be allocated for residential development within St Nicholas. This would form a logical amendment to the Settlement Boundary to include the western parcel (former Paddock) of Candidate Site - The Spinney, St Nicholas (Site Ref: 460). The current Settlement Boundary is illogical as the site is surrounded by development on 3 boundaries and the simple rounding off along the southern boundary would allow for an appropriate windfall infill development.
Conservation Area

Given the above then it is considered that the Conservation Area boundary would need to be amended to reflect the allocation of the site.
These amendments would be required to the Deposit Proposals Map.

Site Assessment
The site was promoted through the Candidate Site process and assessed at Preferred Strategy stage. However, it is not allocated within the Deposit Plan and thus was not subject to updated reassessment as part of this stage of plan preparation.

For completeness, and in order to clearly demonstrate the limited and proportionate nature of the site's constraints, the previous site assessment summary table is reproduced below. This is included to highlight that the site performs favourably in sustainability and deliverability terms, and that the matters previously cited as constraints are capable of mitigation through design.

A table comparing an updated site assessment prepared by Boyer against the Council's assessment has been provided.

This representation, submitted on behalf of Mr Fairweather in response to the current Vale of Glamorgan Council Replacement Local Development Plan (RLDP) 2021–2036 Deposit Plan Consultation, maintains that Land adjoining The Spinney, St Nicholas (Site Ref: 460) represents a logical, sustainable and deliverable parcel that should be allocated as a suitable and viable residential site within the RLDP.

Significant concern remains regarding the absence of residential allocations within Minor Rural Settlements, particularly St Nicholas, and the continued reliance on a limited flexibility allowance under Policy HG1. An increased flexibility margin of up to 15% would necessitate the identification of additional sustainable and deliverable sites. Such growth should be directed, in part, toward appropriate locations within Minor Rural Settlements to ensure a genuine range and choice of housing and to support rural community sustainability.

It is further noted that the site performs favourably in the Council's Candidate Site Assessment, with limited constraints identified. The matters previously raised, including Conservation Area considerations, are capable of sensitive mitigation through design and have been subject to detailed review. There is no substantive evidence demonstrating that the site is

unsuitable for development.

Accordingly, the site is considered to represent a suitable, available and achievable allocation capable of contributing to the housing requirement, supporting affordable housing delivery, and reinforcing the spatial objectives of the Plan. The Deposit Plan should therefore be amended to allocate Land adjoining The Spinney, St Nicholas (Site Ref: 460), or alternatively identify it as a reserve or flexibility site, in order to ensure the Plan is justified, effective and deliverable.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/397

6865 Comment

Document Element: HG4 - RURAL AFFORDABLE HOUSING LED SITES

Respondent: Mr Andrew Raymond [1170]

Agent: Boyer Planning

Summary:

It is recognised that Policy HG4 allocates development within some Minor Rural Settlements, and in particular within Colwinston. In the context of Policy HG4 they will be affordable housing led sites where there will be a requirement for the provision of a minimum 50% affordable housing. This is to meet the affordable housing needs of the local community. There is no objection in principle to this.

However, a balanced approach which allows both affordable housing led schemes and modest mixed-tenure developments would provide greater flexibility and assist in delivering a broader range of housing needs.

Full text:

Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409)
Boyer have prepared the following representation on behalf of Andrew Raymond regarding their land interests associated with Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) in response to the current Vale of Glamorgan Replacement Local Development Plan (RLDP) 2021– 2036 consultation.

A summary of the main representations are as follows:
• Concern regarding the absence of proportionate residential growth opportunities within rural settlements such as Colwinston;
• Concern regarding the overall housing requirement and the need for an increased flexibility allowance within the housing trajectory;
• Questions regarding the spatial distribution of development and the limited range and choice of sites outside the Strategic Growth Area;
• Confirmation that Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) represents a logical and sustainable opportunity for modest residential development;
• Review of the Candidate Site Assessment process and the current status of the site within the Candidate Site Register; and
• The need to consider appropriate settlement boundary adjustments to facilitate proportionate growth in sustainable rural settlements.

SP1: Sustainable Growth Strategy
Whilst Policy SP1 outlines the housing delivery requirement (addressed under the response to SP6), the principal concern in relation to the site promotion is the concentration of the majority of future housing growth within the defined Strategic Growth Area.
It is understood and supported that new housing development should be located in sustainable locations with access to public transport and services. However, the approach adopted within the RLDP places an overly narrow emphasis on growth within the Strategic Growth Area, primarily focused along rail corridors. This approach risks overlooking other sustainable rural settlements which also demonstrate appropriate connectivity and capacity to accommodate proportionate growth.

Settlements outside the Strategic Growth Area continue to perform an important role within the Vale's settlement hierarchy and rural economy. Villages such as Colwinston provide an established residential community and contribute to the vitality and sustainability of rural areas. Restricting opportunities for modest growth within such settlements risks undermining the long-term sustainability of rural communities.

The principle of directing development to sustainable settlements is supported. However, limiting development opportunities exclusively within the Strategic Growth Area is not considered to represent the most balanced or flexible spatial strategy. Greater flexibility should be introduced to allow appropriate small-scale allocations within sustainable rural settlements.

In this context, Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) represents a sustainable opportunity for a modest residential development that would align with the scale and character of the settlement. The site lies adjacent to existing built form and would represent a logical and contained extension to the village.
SP2: Settlement Hierarchy

Mr Raymond supports the identification of Colwinston as a Minor Rural Settlement and acknowledged its capacity to accommodate proportionate and sustainable growth, particularly given its accessibility and relationship with Bridgend to the west and Cowbridge, Barry and Cardiff to the east. The Deposit Plan retains Colwinston within the Minor Rural Settlement tier, however, does confirm that the settlement is outside the Strategic Growth Area.
Whilst the overarching principle of directing growth to the most sustainable settlements is supported, the Plan does not clearly demonstrate why settlements that are well connected and functionally related to larger centres, such as Colwinston, should be subject to such constrained growth.

In this context, Mr Raymond highlights Paragraph 3.10 which indicates that Minor Rural Settlements provide an 'important range of services and facilities that play a functional role in meeting some of the basic needs of residents within rural areas, reducing the need to travel'.
Building upon this, Policy SP2 does highlight that 'Minor Rural Settlements identified will be limited to the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments'.

Furthermore, the supporting text to Policy SP2 (Paragraph 6.17) confirms that 'those settlements that are considered to have sufficient population, services, and facilities to accommodate small scale growth without it having a detrimental impact on their existing character and local environment'.

This all building upon the identified importance of Minor Rual Settlements within the Preferred Strategy which outlined in Paragraph 6.50 that it is 'essential for the LDP to balance the growth in a way that supports the need of rural communities' and whilst it is evident that within these settlements 'general market housing will be limited to opportunities including infill' (Paragraph 6.51), the enabling of an element of 'open market housing will provide opportunities for the delivery of affordable housing reflecting the aspirations of rural communities to sustain their housing needs' (Paragraph 6.51). This importance of Minor Rural Settlements needs to be carried more strongly forward in the Deposit Plan.

Moreover, the evidence base does not sufficiently justify the degree of restriction now applied, nor does it explain why proportionate additional growth in appropriate Minor Rural Settlements would undermine the spatial strategy. As drafted, the policy risks limiting flexibility in the distribution of housing across the Vale. Accordingly, it is considered that the approach to Colwinston under Policy SP2 is not justified.

Clearly there continues to be a disconnect between the identified role and function of Colwinston, which is supported, and the actual ability to deliver the appropriate range and choice of dwellings in the rural settlements. For example, a modest allocation at Land adjacent to Waterton Lodge, Colwinston (Candidate Site 409) would represent proportionate growth that reflects the scale and character of the settlement. The site sits adjacent to existing development and would consolidate the existing settlement pattern without resulting in sprawl into the open countryside.

The current approach within Policy SP2 risks constraining flexibility within the spatial strategy and limiting opportunities to support sustainable rural communities.

SP6: Housing Requirement
Concerns are raised regarding the overall housing requirement and the level of flexibility incorporated within the Plan.

Policy SP6 currently establishes a housing requirement of 7,890 dwellings over the Plan period and includes a flexibility allowance of 10%, resulting in an overall provision of 8,660 dwellings.
The proposed supply is anticipated to be delivered through:
• 3,837 dwellings from the existing land supply
• 3,520 dwellings on allocated sites
• 1,303 dwellings from large and small windfall developments
Whilst the inclusion of a flexibility allowance is supported, it is considered that a 10% allowance may not be sufficient to ensure resilience within the housing trajectory.
Recent experience from other Local Development Plans across Wales has demonstrated the importance of incorporating higher flexibility allowances to account for delivery uncertainty, infrastructure constraints and potential delays to larger strategic sites.

For example, other authorities have incorporated flexibility allowances in excess of the standard 10% to ensure the robustness of their housing supply and to provide a greater degree of adaptability should circumstances change during the Plan period.

In this context, it is considered that the Vale of Glamorgan RLDP should incorporate a flexibility allowance of at least 15%. This would provide additional resilience within the housing trajectory and reduce reliance on a limited number of larger strategic allocations.

Smaller sites such as Candidate Site 409 at Waterton Lodge, Colwinston are particularly valuable in this context. Smaller sites are typically:
• More deliverable in the short term
• Less dependent on major infrastructure investment
• Capable of contributing to early housing delivery
• Able to increase overall build-out rates
Such sites can therefore play an important role in supporting the delivery of the Plan's housing requirement and enhancing flexibility within the supply.

HG1: Housing Allocations
Mr Raymond does not comment on any of the proposed housing allocations, however, does highlight that the delivery is incumbent upon a number of larger strategic sites, and that to allow a greater range and choice then smaller allocations in the Minor Rural Settlements are required. Only 122 units are proposed on smaller allocated sites, equating to approximately 2.6% of newly allocated supply under (E) Rural Affordable Housing Led Sites – policy HG4.

In the context of the above, there remains significant concern that the spatial strategy continues to exclude the required number of allocations within Minor Rural Settlements, including Colwinston.

The Plan recognises that Minor Rural Settlements provide an important range of services and facilities and play a functional role in meeting the needs of residents within rural areas. It further acknowledges that it is essential for the LDP to balance growth in a way that supports rural communities. Whilst general market housing is described as being limited to infill opportunities, the Plan also recognises that enabling an element of open market housing provides opportunities for the delivery of affordable housing and helps sustain rural communities.
It is agreed that the inclusion of smaller allocations can:
• Improve overall housing delivery rates
• Provide greater choice within the housing market
• Reduce delivery risk by diversifying supply
• Support rural communities through proportionate growth

Whilst it is noted that there is a proposed allocation within Colwinston – HG4 (1) – Land to the East of Colwinston for 25 units, Mr Raymond maintains that there is still a clear disconnect between the identified role and function of settlements such as Colwinston and the absence of any further allocated sites capable of delivering an appropriate range and choice of dwellings.

The strategy effectively restricts development to windfall and infill, without positively identifying opportunities that would logically consolidate and strengthen the settlement.
This approach is inconsistent with the settlement's accessibility and functional role. Colwinston is:
• Well connected to the A48 strategic highway network;
• Served by bus routes within close proximity to the site;
• Within commuting distance of Bridgend, Cowbridge, Barry and Cardiff;
• A sustainable and established residential community.
Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409) represents a contained and sustainable opportunity that naturally rounds off the existing settlement boundary. The site encloses the envelope of development without encroaching into open countryside or extending beyond the established line of built form. It is well related to existing services and infrastructure and is capable of accommodating a modest allocation consistent with the scale and character of the village.

A proportionate allocation at this location would align with the stated objectives of supporting rural communities, enabling a mix of market and affordable housing, and providing genuine choice within Minor Rural Settlements. The continued absence of such allocations undermines the internal consistency of the spatial strategy.

Furthermore, the strategy places substantial emphasis on rail-based corridors. Whilst development near rail infrastructure is supported in principle, sustainable growth should not be exclusively rail-led. Strategic highway connectivity and bus accessibility also represent legitimate and sustainable locational advantages.

The complete absence of allocations in Minor Rural Settlements creates an imbalance in distribution and limits housing choice. A modest allocation at Waterton Lodge would represent proportionate growth consistent with the scale and character of the settlement.

HG4 – Affordable Housing Allocations
It is recognised that Policy HG4 does allocate development within some Minor Rural Settlements, and in particular within Colwinston HG4 (1) – Land to the East of Colwinston for 25 units. In the context of Policy HG4 they will be affordable housing led sites where there will be a requirement for the provision of a minimum 50% affordable housing. This is to meet the affordable housing needs of the local community. Mr Raymond has no objection in principle to this but does object to the fact that there is no other development opportunities recognised in Colwinston (despite it being sustainably located on the A48).

Furthermore, Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409) could be reduced in size and could be

amended to offer 50% affordable housing to accord with the policy (or even 100% affordable if the Authority sought this).

A balanced approach which allows both affordable housing led schemes and modest mixed-tenure developments would provide greater flexibility and assist in delivering a broader range of housing needs.

A modest development at Land adjacent to Waterton Lodge, Colwinston (Candidate Site 409) could provide an opportunity to deliver both market and affordable housing in accordance with Policy SP8. This would support local housing needs whilst maintaining the scale and character of the settlement.

Candidate Site Response: Land adjacent to Waterton Lodge, Colwinston (Candidate Site 409)
Candidate Site 409 (Land adjacent to Waterton Lodge, Colwinston) was submitted to the Vale of Glamorgan Council during the 2022 Call for Candidate Sites as part of the preparation of the Replacement Local Development Plan (RLDP) 2021–2036.

The site is currently included within the Candidate Site Register, which represents a list of sites submitted for consideration through the plan-making process. Inclusion within the register does not in itself indicate that a site will be allocated for development, as all sites are subject to a structured assessment process.

These stages consider a range of factors including sustainability, accessibility, environmental constraints and deliverability.

As part of the ongoing plan preparation process, the Council produced an updated Candidate Site Register following the initial submissions. Sites continue to be evaluated as part of the evidence base supporting the RLDP.

In this context, Land adjacent to Waterton Lodge, Colwinston represents a sustainable and deliverable opportunity for modest residential development which could contribute positively towards the Plan's housing supply.

The site is located adjacent to the existing settlement and is well related to the current built form. Development in this location would represent a logical and contained extension to the village, rather than an isolated incursion into open countryside.

Furthermore, the site has been promoted through the formal candidate site process and should therefore be considered fully within the Council's site assessment framework.

Deposit Plan Considerations
Settlement Boundary

Given the location of Candidate Site 409 adjacent to the existing settlement of Colwinston, consideration should be given to whether a modest adjustment to the settlement boundary would enable the site to be appropriately integrated within the settlement.

A logical rounding-off of the existing settlement edge would allow development to occur in a manner that respects the existing built form and maintains a clear and defensible settlement boundary.

Such an approach would represent a proportionate response to the need for modest housing growth within rural settlements.

Site Assessment
The site was formally submitted through the Candidate Site process and is currently listed within the Council's Candidate Site Register.

Given the role that smaller deliverable sites can play in supporting housing delivery, it is important that sites such as Land adjacent to Waterton Lodge, Colwinston are fully considered as part of the ongoing assessment process.
Smaller sites can provide valuable flexibility within the housing trajectory and contribute to early housing delivery within the Plan period.

Turning to the main reasons the site was not taken forward Mr Raymond provides the following response:
(a) Alleged intrusion into the open countryside
The Stage 2 Register cites "unacceptable intrusion into the open countryside". Mr Raymond submits that this conclusion fails to reflect the site's physical containment and relationship to the built form.
• The site directly adjoins existing dwellings at Waterton Lodge and mature boundary hedgerows; development here would constitute rounding-off rather than isolated sprawl.
• A strong landscape framework already exists, and additional planting could reinforce defensible boundaries.
Accordingly, the site's development would not materially extend the settlement into open countryside or harm landscape character, consistent with PPW paragraph 3.60.
(b) Highways and accessibility constraints
The Council refers to "major highways constraints" but no evidence highway assessment has been published by the Authority. Mr Raymond's preliminary review confirms that safe vehicular access can be achieved from the adjoining local

highway with modest engineering works and that the scale envisaged would generate limited traffic, well within local-road capacity.
Future submission of a Transport Statement can demonstrate compliance with PPW (Section 5: Active and Socially Just Places) and LDP Policy MD2 (criteria 6 and 8).
The site lies within walking distance of Colwinston's core facilities (village hall, public house, bus stops), enabling sustainable travel choices for residents.
(c) Scale of development
Development at a scale that represents proportionate growth for Colwinston can be provided and would be entirely consistent with the "limited expansion" envisaged for minor rural settlements under PPW and the RLDP.
This level of growth would strengthen local demographics, support the rural housing supply and modestly contribute to the Vale's overall housing requirement, without exceeding infrastructure capacity.
(d) Ecology, landscape and agricultural land classification
The land is semi-improved grassland with no statutory designations. Preliminary review indicates no SINC coverage or protected species constraints. Detailed ecological and agricultural-land surveys can be provided to confirm that any residual impacts are minor and capable of full mitigation.

Development can achieve net biodiversity gain through buffer planting, sustainable drainage and native-hedgerow reinforcement, fully consistent with PPW and RLDP environmental objectives.

5. Sustainability and deliverability
• Availability: Mr Raymond, as landowner/promoter, confirms the site is immediately available for development.
• Deliverability: The site is modest, unconstrained by flood risk or abnormal infrastructure requirements, and can deliver homes within the early part of the plan period.
The proposal supports rural-settlement vitality, contributes to local housing choice, and allows design to embody placemaking principles (PPW Ed. 12 Section 2).

Conclusion
This representation, submitted on behalf of Mr Raymond in response to the current Vale of Glamorgan Council Replacement Local Development Plan (RLDP) 2021–2036 Deposit Plan Consultation, maintains that Land adjacent to Waterton Lodge, Colwinston (Site Ref: 409) represents a logical, sustainable and deliverable parcel that should be allocated as a suitable and viable residential site within the RLDP.

Accordingly, the site is considered to represent a suitable, available and achievable allocation capable of contributing to the housing requirement, supporting affordable housing delivery, and reinforcing the spatial objectives of the Plan.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3vf

7046 Object

Document Element: HG4 - RURAL AFFORDABLE HOUSING LED SITES
Respondent: Marion morgan [2413]
Agent: Geraint John Planning Ltd

Summary:

It is not considered that this policy goes far enough to address the target and level of affordable housing need. Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ystradowen area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:
VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Ystradowen. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural

economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months
• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the

preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:
Table 6: Existing LDP allocations to be carried forward

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is

met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.
Extract of Housing Trajectory (annotated by GJP - red dotted line)

It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.
Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.
HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.
Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty

years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.
It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land at Ystradowen (Site ID: 430 / 4060) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) and Annex 2 for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 230 affordable homes in the Cowbridge housing market area / ward - which Ystradowen is located within. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation – see Annex 2.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ystradowen and the proposed site. As outlined within these representations, it is considered that the site (ID 430) represents a sustainable, deliverable and acceptable site. The site is located within 2.7 miles Cowbridge and 2.8 miles of Pontyclun. Due to the availability of frequent bus services, and active travel links, key services are readily

available to access for any residents within Ystradowen without the need to travel by car. The site is within a maximum 9- and 14-minute bus journey (respectively) of the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Accordingly, the settlement of Ystradowen represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ystradowen, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.
As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 "For the purposes of this policy, 'small-scale' will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."
The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.
SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

Deliverability of the Site

In summary, the site seeks to deliver the following key elements:

• Provision of circa 67 new-build residential dwellings (including 50% affordable housing provision);
• A mix of house-types and tenures across the site to cater for a variety of needs;
• Creation of a new primary access into the site;
• Connection to pedestrian links within the wider area;
• Public open space; and
• Green Infrastructure; and
SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

Land at Ystradowen (Site ID: 4060)

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site. The 'Candidate Sites Assessment Deposit Plan Stage v2' for 'Land at Ystradowen (Site ID: 4060)' sets out that the position of the site at the Deposit Stage is as follows:

"Amendment of proposed use from housing to affordable housing led. Previous site reference 430. The original assessment concluded that whilst the site was adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.
The LDP site in question has subsequently been granted planning permission for housing. This site will serve the future needs of residents in the area and it is not considered that additional land should be allocated in this location."

In terms of the first paragraph, the assessment/conclusion implies and suggests that 'Land at Ystradowen' (4060)' does not adjoin the existing LDP settlement boundary as the allocated site ('Land off Sandy Lane, Ystradowen') has not been built out – "by virtue of an existing adopted plan LDP allocation this is currently under review". Detailed representations have been made and submitted previously at the Housing Trajectory (see Appendix B& C) that outlines that this is fundamentally incorrect. This is not repeated in full here, with just the main points re-iterated.

First and foremost, 'Land at Ystradowen (4060)' directly adjoins the existing LDP settlement boundary. Secondly, there has been a significant change in the position and circumstances. The allocated site ('Land off Sandy Lane, Ystradowen') is currently being "built out", with work commencing on site (see photographic evidence in Appendix C)
- post the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024).
Accordingly, the site no longer adjoins "the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review". Given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.

With regards to the second paragraph, the assessment/conclusion outlines that "The LDP site … will serve the future needs of residents in the area and it is not considered that additional land should be allocated in this location". The arguments and case presented in Appendix B & C. There is a clear overreliance on 'rolled forward' sites / existing allocated sites. A total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%). We believe that a greater level of growth is achievable and should be considered. Not least as there is an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings). As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy. Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. The provision of housing should be adjusted to

rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply. The "future needs of residents in the area" will therefore not be met/served by just this site, and it is considered that additional land should be allocated in this location.

Furthermore, to reinforce, illustrate, and evidence the point in specific reference to the site the subject to this representation (located in Ystradowen), reference is made to application ref. 2013/00856/OUT – 'Land off Badgers Brook Rise, Ystradowen'. The Final Report of the application states that "Ystradowen is considered a sustainable settlement for further housing development" – i.e. "additional land should be allocated in this location".

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan (see Appendix B), a similar 'scoring' exercise has been undertaken as part evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage can be seen below for reference:
BP18 Candidate Ste Assessment at Preferred Strategy Stage
As demonstrated above, there has been a positive change to the scoring attributed to the site ('Land at Ystradowen'). The change is a positive change to the 'Infrastructure Availability' section changing from: 'Grey' (no score) to 'Amber'. Infrastructure Availability is outlined as: "Existing or proposed services would be suitable subject to local improvements without impacting on development viability and/or delivery timescales" (see below):
The explanation for the scoring provided by the Vale sets out that "Sites will be assessed against the availability of water connections to the site, in addition to the method of foul sewage disposal from the site. Consultation shall be undertaken with DCWW to determine whether there is sufficient capacity to the wastewater treatments works, and how it links into DCWW's Capital Investment Programme.
Where consultation indicates limited capacity, or the site is located away from a viable connection this may impact on the deliverability/viability of a site should this require significant connection costs or upgrades. Consequently, the Council shall require site proposers to undertake detailed site viability assessment to determine the impact that additional cost shall have on development cost and deliverability timescales."

As set out above, this is a positive change. This is most likely derived from the allocated site ('Land off Sandy Lane, Ystradowen') currently being "built out", with work commencing on site that would facilitate and improve the 'Infrastructure Availability'. This re-iterates the point made previously re the incorrect assessment reached, and the ever changing position of this site – which will only improve given the neighbouring allocated site ('Land off Sandy Lane, Ystradowen') being "built out".

Land West of Maendy Road, Aberthin (Site ID: 2299)

There are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and the site the subject of these representations. It is therefore considered pertinent to assess and compare the suitability of 'Land West of Maendy Road, Aberthin'. Not least as 'Land at Ystradowen (Site ID: 4060)' is for a "small-scale affordable housing led development in a minor rural settlement", within "the ward of Cowbridge".

The site 'Land West of Maendy Road (Site ID: 2299)' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however from our review of the evidence base submitted as part of the Housing Trajectory consultation, there was no assessment and critique of this site at this stage. This raises questions regarding the "soundness" of this site, given it appears this sites acceptability and inclusion was pre-determined.

The site ('Land West of Maendy Road') has since had a detailed assessment and critique published, however concerns still remain regarding the "soundness" of the site which forms part of the intended housing land supply. The 'Stage 2 Detailed Site Assessment' summary undertaken for 'Land West of Maendy Road' has been extracted below:

"The site is proposed for a small-scale affordable housing led development in a minor rural settlement, which would accord in principle with the strategy. Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent.
The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that."

As mentioned previously, there are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)' (the subject of these representations). Firstly 'Land at Ystradowen (Site ID: 4060)' is also for a "small-scale affordable housing led development", that is "in a minor rural settlement" (Ystradowen). Accordingly, it should follow that as 'Land West of Maendy Road, Aberthin (Site ID: 2299)' "would accord in principle with the strategy", 'Land at Ystradowen (Site ID: 4060)' would also "accord in principle with the strategy".

Furthermore, there is no material difference between the following assessment of Aberthin and Ystradowen:

"Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent."

There is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms.

As set out in our representations to the Preferred Strategy, we reviewed the key services in proximity to the site. The following services were identified as part of that review:

• In terms of public transport, there are two bus stops located approximately 0.2 miles (4-minute walk) from the site ('Land West of Maendy Road'), with the 321 providing services between Llantwit Major and Talbot Green;

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin;

• The site is also located 0.2 miles (4-minute walk) from The Farmers Arms Pub and 0.2 miles (4-minute walk) from The Hare and Hounds Inn; and

• The site is located 0.2 miles (5-minute walk) from Aberthin Village Hall.

Given the above, "The settlement (Ystradowen) is also served by public transport".
Furthermore, Ystradowen is located only 2.7 miles from Cowbridge (9-minute bus journey). The "primary and secondary school provision with the wider range of services and facilities in Cowbridge" mentioned in relation to Aberthin are therefore also in close proximity to Ystradowen.

Given the above, any candidate site at 'Land at Ystradowen' (the subject of these representations – Site ID: 430 / 4060) is no less sustainable than the site at Aberthin (Site ID: 2299).

Not least as the following additional key services are located within Ystradowen and therefore in close proximity to the promoted site:

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'; and
• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Furthermore it is important to note that the above scoring criteria is very limiting, and does not take into account the important role and proximity of settlements in a wider context. For example, it does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant) – see Appendix B for full details.

In addition, as set out within the representations made in relation to the House Trajectory (Appendix C), the following extracts have been taken from the Officer's Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:
As set out above, it is important to note that the Final Report of application ref. 2013/00856/OUT states that "Ystradowen is considered a sustainable settlement for further housing development", due to "the sustainable nature of the settlement". Furthermore, the Final Report of app ref. 2023/00948/FUL states:

• "Notwithstanding this, the site is located in close proximity to local services and there is a bus stop located nearby. Whilst the comments relating to the reliance and frequency of the bus services have been considered, there still remains a bus service in the area"; and
• "Firstly, as aforementioned, many neighbouring comments refer to the site as unsustainable and have commented on the suitability of public transport and cycle routes etc. This has been addressed above."

The above clearly evidences that the location has previously been endorsed as, and is currently still found to be, sustainable.

Accordingly, it can be considered therefore that if the proposed allocated site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen (Site ID: 430 / 4060)' is equally suitable to be an Affordable Housing Led Allocation.

The second section/paragraph of the assessment states:

"The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that."
'Land at Ystradowen (Site ID: 4060)' is also located within "the ward of Cowbridge". As per the above and outlined by the Authority, there is "a need for 230 additional affordable units over the next 15 years". It is clear therefore that there is a

need for additional affordable units in this ward, and this site would therefore also help to alleviate this need.

This position is a direct contradiction of course of the assessment/conclusion for 'Land at Ystradowen (Site ID: 4060)' which stated "it is not considered that additional land should be allocated in this location". It is clear from the above however that "additional land should be allocated in this location" to satisfy this "need for 230 additional affordable units over the next 15 years" – which 'Land at Ystradowen (Site ID: 4060)' can do. This is not least the case given the detailed arguments, case and representations presented and evidenced previously above and in Appendix B & C.
To briefly reiterate there is a clear overreliance on 'rolled forward' sites / existing allocated sites which has resulted in the unmet need deriving from the existing LDP being still present. A greater level of provision for new allocations should therefore be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply, so these can "make an important contribution in meeting" the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" – which 'Land at Ystradowen (Site ID: 4060)' can do.

As set out within the representations made in relation to the housing trajectory (see Appendix C), a further key consideration to note and one which does differentiate between the relative merits of the 'Land at Maendy Road, Aberthin' and 'Land at Ystradowen' is that the LDP Proposals Map demonstrates that 'Land West of Maendy Road' is within a Special Landscape Area - see below:
Vale of Glamorgan Proposals Map (Land West of Maendy Road outlined in red
Under Policy MG17 'Special Landscape Areas' it is considered that development in SLA could pose an "unacceptable harm to the important landscape of the area". Accordingly, this development and proposed allocation could therefore cause "unacceptable harm to the important landscape of the area".

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any "unacceptable harm to the important landscape of the area".
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)
It is noted that the detailed assessment scores the site 'amber' in respect to Special Landscape Area (refer to / see later section for full details), with the assessment methodology setting out that "the site is located within a Special Landscape Area/The Glamorgan Heritage Coast and the development may result in little or no change in character and little or no significant effect on landscape character and visual amenity."
A detailed assessment of the impact upon the SLA in respect to the development of 'Land West of Maendy Road, Aberthin' should therefore be, and will need to be, undertaken as part of any planning application. If it is found that the site causes "unacceptable harm to the important landscape of the area", this will lead to this proposed allocation being at risk of not being delivered. This will be as a result of its impacts and acceptability at the planning application stage that the landscape and visual impact of development of the site is unacceptable. As such, these proposed affordable units are at a potential considerable risk of being lost and not satisfying the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" – which 'Land at Ystradowen (Site ID: 4060)' can do as it is not located in an SLA.

In addition the draft housing trajectory set out that "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" is not provided for. This is clearly an issue. Given however 'Land at Ystradowen' does not sit within a SLA – and so not pose any potential concern or cause any "unacceptable harm to the important landscape of the area" – the allocation of this site would be more suitable and "safer" - as there would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for, and the need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" would be satisfied.

As mentioned previously, a detailed assessment and critique has now been undertaken of 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part evidence base for the Deposit Plan using the similar 'scoring' exercise. As such, it is again pertinent to consider and respond to the Council's 'scoring' exercise assessment of the site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part of these representations.

The 'Summary of Assessment of New Candidate Sites' table can be seen overleaf for reference:
BP18A Candidate Site Assessment at Deposit Plan Stage
A comparison between the site assessments undertaken for both 'Land West of Maendy Road, Aberthin (Site ID: 2299)' (on the left), and 'Land at Ystradowen (Site ID: 4060)' (on the right) has been undertaken, and can be seen below for reference:

Having undertaken a review of the scoring for both 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)', it is clear that 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)':

• 'Land at Ystradowen (Site ID: 4060)': 17/33 criteria are scored green = 52%

• 'Land West of Maendy Road, Aberthin (Site ID: 2299)': 12/34 criteria are scored green = 36%

It is clear therefore given the above that 'Land at Ystradowen (Site ID: 4060)' is a better site, and should be allocated accordingly.

One key example to note is how the criterion 'Access to Services and Facilities' has been scored. For 'Land at Ystradowen (Site ID: 4060)' this has been scored green, yet for 'Land West of Maendy Road, Aberthin (Site ID: 2299)', this has been scored red. Given this, this corroborates the position outlined previously above that, if the proposed allocated site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen (Site ID: 430 / 4060)' is equally as sustainable – in fact considered more suitable (given its higher scoring in this respect).

Furthermore, we question the "soundness" of the assessment of 'Land West of Maendy Road, Aberthin (Site ID: 2299)', given that 7/34 (21%) of the criteria do not appears to have not been assessed – i.e. 7/34 (21%) of the criteria are scored grey. This raises questions regarding the "soundness" of this site, given it appears this sites acceptability and inclusion was pre-determined.

It is clear therefore that if 'Land West of Maendy Road, Aberthin (Site ID: 2299)' has been deemed acceptable for allocation, yet 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than this site, 'Land at Ystradowen (Site ID: 4060)' should also be deemed acceptable and be allocated. Not least as the site is "proposed for a small-scale affordable housing led development in a minor rural settlement … would accord in principle with the strategy", and "could make an important contribution in meeting "a "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge".

Summary and Conclusion

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Deposit Plan published as part of the consultation.

In terms of SECTION 4, and a response to the Candidate Site Assessment at Deposit Plan Stage, the following key points have been made:

• The Council's 'Stage 2 Detailed Site Assessment' justification for 'Land at Ystradowen (Site ID: 4060)' is fundamentally incorrect;

• Given the material positive similarities between 'Land at Ystradowen (Site ID: 4060)' and 'Land West of Maendy Road, Aberthin (Site ID: 2299)', which has been deemed acceptable and allocated, 'Land at Ystradowen (Site ID: 4060)' should also be deemed acceptable and allocated accordingly;

• 'Land at Ystradowen (Site ID: 4060)' would help to alleviate and satisfy "a need for 230 additional affordable units over the next 15 years" within "the ward of Cowbridge"; and
• 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)', and so should also be deemed acceptable and be allocated;

Ultimately, 'Land at Ystradowen (Site ID: 4060)' is "proposed for a small-scale affordable housing led development in a minor rural settlement", and as such "would accord in principle with the strategy". It would therefore "make an important contribution in meeting" the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge".

We would therefore object the Council's assessment that the site is not considered suitable for development.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;

3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Credentials of this site subject to this submission; and
10. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing-led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the east of Coliwinston, Colwinston.

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the

delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicted in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.
Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.
The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.
Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report

(September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.
Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:
Table 6: Existing LDP allocations to be carried forward
The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.
Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate

sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision.
Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".
As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision, and as such, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations

Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
Candidate Site Stage 2 Assessment (Site Ref. 404)
The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:
"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clearly evident deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Despite the absence of site-specific assessment criteria, as the RLDP preferred strategy states a key objective guiding site selection is that the Plan will "provide for vital and vibrant rural communities whilst protecting the countryside through the delivery of growth in sustainable locations related to the settlement hierarchy alongside the provision of supporting infrastructure" (Objective 7 'Fostering Diverse Vibrant and Connected Communities'), it is reasonable to assume that the Council considers 'Land West of Maendy Road' to be a 'sustainable' location.

Given this, we have reviewed the key services in proximity to the site. The following services were identified:

• In terms of public transport, there are two bus stops located approximately 0.2 miles (4-minute walk) from the site ('Land West of Maendy Road'), with the 321 providing services between Llantwit Major and Talbot Green.

• The site is also located 0.2 miles (4-minute walk) from The Farmers Arms Pub and 0.2 miles (4-minute walk) from The Hare and Hounds Inn.

• The site is located 0.2 miles (5-minute walk) from Aberthin Village Hall.

Aberthin is in close proximity (1.2 miles/14-minute walk) to the key settlement of Cowbridge - which is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Considering this, there is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms. Given that Ystradowen is located only 2.7 miles from Cowbridge (9- minute bus journey), the candidate site at 'Land at Ystradowen' is no less sustainable than the site at Aberthin. The following key services are within Ystradowen and therefore in close proximity to the promoted site:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin.
• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Accordingly, it can be considered therefore that if the proposed allocated site 'Land West of Maendy Road, Aberthin' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen' is equally suitable to be an Affordable Housing Led Allocation.
Furthermore, to reinforce the above position and to illustrate and evidence the site's sustainability, the following has been taken from the Officer's Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:
Reference is made in the Final Report of app ref. 2013/00856/OUT which states that "Ystradowen is considered a sustainable settlement for further housing development", due to "the sustainable nature of the settlement".

Furthermore, the Final Report of app ref. 2023/00948/FUL states:

• “Notwithstanding this, the site is located in close proximity to local services and there is a bus stop located nearby. Whilst the comments relating to the reliance and frequency of the bus services have been considered, there still remains a bus service in the area.”
• “Firstly, as aforementioned, many neighbouring comments refer to the site as unsustainable and have commented on the suitability of public transport and cycle routes etc. This has been addressed above.”

The above clearly evidences that the location has previously been endorsed as, and is currently still found to be, sustainable.

A further key consideration to note and one which does differentiate between the relative merits of the ‘Land at Maendy Road, Aberthin’ and ‘Land at Ystradowen’ is that the LDP Proposals Map demonstrates that ‘Land West of Maendy Road’ is within a Special Landscape Area - see overleaf:
Vale of Glamorgan Proposals Map (Land West of Maendy Road outlined in red)
Under Policy MG17 ‘Special Landscape Areas’ it is considered that development in SLA could pose an “unacceptable harm to the important landscape of the area”. Accordingly, this development and proposed allocation could therefore cause “unacceptable harm to the important landscape of the area”.

‘Land at Ystradowen’ by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any “unacceptable harm to the important landscape of the area”.
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)

This is a significant factor to consider. ‘Land West of Maendy Road, Aberthin’ causing “unacceptable harm to the important landscape of the area” will lead to this proposed allocation being at risk of not being delivered by virtue of detailed assessments of its impacts and acceptability at planning application stage holding that the landscape and visual impact of development of the site is unacceptable. As such 25 affordable units will be lost from the proposed affordable 122 units, and ultimately being lost from the overall housing land supply. As stated in the draft housing trajectory “there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities”. There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a “small scale affordable housing led development” which is needed to “respond to local affordable needs and help sustain services and facilities within these rural communities” is not provided for. This is clearly an issue. Given however ‘Land at Ystradowen’ does not sit within a SLA – and so not pose any potential concern or cause any “unacceptable harm to the important landscape of the area” – the allocation of this site would be more suitable and “safer” - as therefore would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where “there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities”, are provided for. As such the proposed housing trajectory would be maintained.
Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of ‘Land to north and west of Westwinds Business Park’:

Candidate Site Stage 2 Assessment (Site Ref. 398)
As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in ‘Sustainable Transport – Public Transport’, this shows the site is not served by public transport connections within 800m, as outlined in the key below:
Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states “New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes”. Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states “new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport.”

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:
In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Ystradowen', the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below. With reference to the above:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green.

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities.

Furthermore, the settlement of Ystradowen has been ranked highly in the VoG Sustainable Settlements Appraisal, scoring a total of 14 points according to the distance to key services and facilities available. This places Ystradowen 26th out of a total of 87 settlements. As a result, this would be deemed a suitable area to accommodate growth.

As stated above the key settlement of Cowbridge is located in close proximity being only 2.7 miles to the south and a 9-minute bus journey. Cowbridge is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Furthermore, it is important to note that the above criteria does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant). These areas comprise for example the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Given the above, 'Land at Ystradowen' does/should align with the aims and targets set out in the Preferred Strategy as it

meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered “sound” and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of ‘Land to north and west of Westwinds Business Park’ – the inclusion of which is “unsound”. ‘Land at Ystradowen’ would therefore ensure that affordable units, where “there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities”, are provided for. As such the proposed housing trajectory would be maintained.
Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike ‘Land at Heol Fain, Wick’ and ‘Land to north and west of Westwinds Business Park’ it was stated that this site “could not be considered as a suitable affordable housing led development site”. Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is “unsound”.

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref. 2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.
Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Credentials of this site subject to this submission

There has been a significant change in the position and circumstances since the promoted site herein was assessed at Candidate Site Stage and the Assessment undertaken. The Stage 2 Assessment of the site concluded the following: ‘Whilst adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.’ The assessment/conclusion implies that as this site (‘Land off Sandy Lane, Ystradowen’) has not been built out and is “currently under review”, it suggests that ‘Land at Ystradowen’ (430) does not adjoin the existing LDP settlement boundary. Given recent developments however associated with the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024) and the site being currently being “built out” and work commencing on site, the site no longer adjoins “the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review”. Accordingly, and given this, the ‘Land at Ystradowen’ site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.
The following specific photo evidences ‘Land off Sandy Lane, Ystradowen’ (Housing Allocation 48) is being built out the western boundary of the promoted Site ID 430. This therefore clearly highlights that the site’s boundary is representing the existing settlement limit in the existing development plan. Accordingly, the ‘Land at Ystradowen’ site boundary therefore directly adjoins/is adjoining the existing LDP settlement boundary.
Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it’s consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gr
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3gt
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g4
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g7
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3g8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gv
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gc

7047 Comment

Document Element: HG4 - RURAL AFFORDABLE HOUSING LED SITES

Respondent: Marion morgan [2413]
Agent: Geraint John Planning Ltd

Summary:
The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land at Ystradowen (Site ID: 430 / 4060) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development.

Full text:
ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ystradowen area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:
VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Ystradowen. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

- Land at North West Barry – 376no. units;
- North of Dinas Powys – 250no. units;
- Land at Readers Way, Rhoose – 520no. units;
- Land at Church Farm, St Athan – 532no. units; and
- Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months
• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required

that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:
Table 6: Existing LDP allocations to be carried forward

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.
Extract of Housing Trajectory (annotated by GJP - red dotted line)

It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past

completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.
Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.
HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.
Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.
It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land at Ystradowen (Site ID: 430 / 4060) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) and Annex 2 for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 230 affordable homes in the Cowbridge housing market area / ward - which Ystradowen is located within. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation – see Annex 2.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ystradowen and the proposed site. As outlined within these representations, it is considered that the site (ID 430) represents a sustainable, deliverable and acceptable site. The site is located within 2.7 miles Cowbridge and 2.8 miles of Pontyclun. Due to the availability of frequent bus services, and active travel links, key services are readily available to access for any residents within Ystradowen without the need to travel by car. The site is within a maximum 9- and 14-minute bus journey (respectively) of the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Accordingly, the settlement of Ystradowen represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ystradowen, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.
As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 "For the purposes of this policy, 'small-scale' will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."
The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.
SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

Deliverability of the Site

In summary, the site seeks to deliver the following key elements:

• Provision of circa 67 new-build residential dwellings (including 50% affordable housing provision);
• A mix of house-types and tenures across the site to cater for a variety of needs;
• Creation of a new primary access into the site;
• Connection to pedestrian links within the wider area;
• Public open space; and
• Green Infrastructure; and
SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

Land at Ystradowen (Site ID: 4060)

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site. The 'Candidate Sites Assessment Deposit Plan Stage v2' for 'Land at Ystradowen (Site ID: 4060)' sets out that the position of the site at the Deposit Stage is as follows:

"Amendment of proposed use from housing to affordable housing led. Previous site reference 430. The original assessment concluded that whilst the site was adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.
The LDP site in question has subsequently been granted planning permission for housing. This site will serve the future needs of residents in the area and it is not considered that additional land should be allocated in this location."

In terms of the first paragraph, the assessment/conclusion implies and suggests that 'Land at Ystradowen' (4060)' does not adjoin the existing LDP settlement boundary as the allocated site ('Land off Sandy Lane, Ystradowen') has not been

built out – "by virtue of an existing adopted plan LDP allocation this is currently under review". Detailed representations have been made and submitted previously at the Housing Trajectory (see Appendix B& C) that outlines that this is fundamentally incorrect. This is not repeated in full here, with just the main points re-iterated.

First and foremost, 'Land at Ystradowen (4060)' directly adjoins the existing LDP settlement boundary. Secondly, there has been a significant change in the position and circumstances. The allocated site ('Land off Sandy Lane, Ystradowen') is currently being "built out", with work commencing on site (see photographic evidence in Appendix C)
- post the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024).
Accordingly, the site no longer adjoins "the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review". Given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.

With regards to the second paragraph, the assessment/conclusion outlines that "The LDP site … will serve the future needs of residents in the area and it is not considered that additional land should be allocated in this location". The arguments and case presented in Appendix B & C. There is a clear overreliance on 'rolled forward' sites / existing allocated sites. A total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%). We believe that a greater level of growth is achievable and should be considered. Not least as there is an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings). As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy. Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply. The "future needs of residents in the area" will therefore not be met/served by just this site, and it is considered that additional land should be allocated in this location.

Furthermore, to reinforce, illustrate, and evidence the point in specific reference to the site the subject to this representation (located in Ystradowen), reference is made to application ref. 2013/00856/OUT – 'Land off Badgers Brook Rise, Ystradowen'. The Final Report of the application states that "Ystradowen is considered a sustainable settlement for further housing development" – i.e. "additional land should be allocated in this location".

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan (see Appendix B), a similar 'scoring' exercise has been undertaken as part evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage can be seen below for reference:
BP18 Candidate Ste Assessment at Preferred Strategy Stage
As demonstrated above, there has been a positive change to the scoring attributed to the site ('Land at Ystradowen').
The change is a positive change to the 'Infrastructure Availability' section changing from: 'Grey' (no score) to 'Amber'.
Infrastructure Availability is outlined as: "Existing or proposed services would be suitable subject to local improvements without impacting on development viability and/or delivery timescales" (see below):
The explanation for the scoring provided by the Vale sets out that "Sites will be assessed against the availability of water connections to the site, in addition to the method of foul sewage disposal from the site. Consultation shall be undertaken with DCWW to determine whether there is sufficient capacity to the wastewater treatments works, and how it links into DCWW's Capital Investment Programme.
Where consultation indicates limited capacity, or the site is located away from a viable connection this may impact on the deliverability/viability of a site should this require significant connection costs or upgrades. Consequently, the Council shall require site proposers to undertake detailed site viability assessment to determine the impact that additional cost shall have on development cost and deliverability timescales."

As set out above, this is a positive change. This is most likely derived from the allocated site ('Land off Sandy Lane, Ystradowen') currently being "built out", with work commencing on site that would facilitate and improve the 'Infrastructure Availability'. This re-iterates the point made previously re the incorrect assessment reached, and the ever changing position of this site – which will only improve given the neighbouring allocated site ('Land off Sandy Lane, Ystradowen') being "built out".

Land West of Maendy Road, Aberthin (Site ID: 2299)

There are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and the site the subject of these representations. It is therefore considered pertinent to assess and compare the suitability of 'Land West of Maendy Road, Aberthin'. Not least as 'Land at Ystradowen (Site ID: 4060)' is for a "small-scale affordable housing led development in a minor rural settlement", within "the ward of Cowbridge".

The site 'Land West of Maendy Road (Site ID: 2299)' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however from our review of the evidence base submitted as part of the Housing Trajectory consultation, there was no assessment and critique of this site at this stage. This raises questions regarding the

"soundness" of this site, given it appears this sites acceptability and inclusion was pre-determined.

The site ('Land West of Maendy Road') has since had a detailed assessment and critique published, however concerns still remain regarding the "soundness" of the site which forms part of the intended housing land supply. The 'Stage 2 Detailed Site Assessment' summary undertaken for 'Land West of Maendy Road' has been extracted below:

"The site is proposed for a small-scale affordable housing led development in a minor rural settlement, which would accord in principle with the strategy. Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent.
The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that."

As mentioned previously, there are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)' (the subject of these representations). Firstly 'Land at Ystradowen (Site ID: 4060)' is also for a "small-scale affordable housing led development", that is "in a minor rural settlement" (Ystradowen). Accordingly, it should follow that as 'Land West of Maendy Road, Aberthin (Site ID: 2299)' "would accord in principle with the strategy", 'Land at Ystradowen (Site ID: 4060)' would also "accord in principle with the strategy".

Furthermore, there is no material difference between the following assessment of Aberthin and Ystradowen:

"Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent."

There is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms.

As set out in our representations to the Preferred Strategy, we reviewed the key services in proximity to the site. The following services were identified as part of that review:

• In terms of public transport, there are two bus stops located approximately 0.2 miles (4-minute walk) from the site ('Land West of Maendy Road'), with the 321 providing services between Llantwit Major and Talbot Green;

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin;

• The site is also located 0.2 miles (4-minute walk) from The Farmers Arms Pub and 0.2 miles (4-minute walk) from The Hare and Hounds Inn; and

• The site is located 0.2 miles (5-minute walk) from Aberthin Village Hall.

Given the above, "The settlement (Ystradowen) is also served by public transport".
Furthermore, Ystradowen is located only 2.7 miles from Cowbridge (9-minute bus journey). The "primary and secondary school provision with the wider range of services and facilities in Cowbridge" mentioned in relation to Aberthin are therefore also in close proximity to Ystradowen.

Given the above, any candidate site at 'Land at Ystradowen' (the subject of these representations – Site ID: 430 / 4060) is no less sustainable than the site at Aberthin (Site ID: 2299).

Not least as the following additional key services are located within Ystradowen and therefore in close proximity to the promoted site:

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'; and
• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Furthermore it is important to note that the above scoring criteria is very limiting, and does not take into account the important role and proximity of settlements in a wider context. For example, it does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant) – see Appendix B for full details.

In addition, as set out within the representations made in relation to the House Trajectory (Appendix C), the following extracts have been taken from the Officer's Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48). An aerial view

extract is outlined below to give spatial context:
As set out above, it is important to note that the Final Report of application ref. 2013/00856/OUT states that "Ystradowen is considered a sustainable settlement for further housing development", due to "the sustainable nature of the settlement". Furthermore, the Final Report of app ref. 2023/00948/FUL states:

• "Notwithstanding this, the site is located in close proximity to local services and there is a bus stop located nearby. Whilst the comments relating to the reliance and frequency of the bus services have been considered, there still remains a bus service in the area"; and
• "Firstly, as aforementioned, many neighbouring comments refer to the site as unsustainable and have commented on the suitability of public transport and cycle routes etc. This has been addressed above."

The above clearly evidences that the location has previously been endorsed as, and is currently still found to be, sustainable.

Accordingly, it can be considered therefore that if the proposed allocated site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen (Site ID: 430 / 4060)' is equally suitable to be an Affordable Housing Led Allocation.

The second section/paragraph of the assessment states:

"The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that."
'Land at Ystradowen (Site ID: 4060)' is also located within "the ward of Cowbridge". As per the above and outlined by the Authority, there is "a need for 230 additional affordable units over the next 15 years". It is clear therefore that there is a need for additional affordable units in this ward, and this site would therefore also help to alleviate this need.

This position is a direct contradiction of course of the assessment/conclusion for 'Land at Ystradowen (Site ID: 4060)' which stated "it is not considered that additional land should be allocated in this location". It is clear from the above however that "additional land should be allocated in this location" to satisfy this "need for 230 additional affordable units over the next 15 years" – which 'Land at Ystradowen (Site ID: 4060)' can do. This is not least the case given the detailed arguments, case and representations presented and evidenced previously above and in Appendix B & C.
To briefly reiterate there is a clear overreliance on 'rolled forward' sites / existing allocated sites which has resulted in the unmet need deriving from the existing LDP being still present. A greater level of provision for new allocations should therefore be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply, so these can "make an important contribution in meeting" the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" – which 'Land at Ystradowen (Site ID: 4060)' can do.

As set out within the representations made in relation to the housing trajectory (see Appendix C), a further key consideration to note and one which does differentiate between the relative merits of the 'Land at Maendy Road, Aberthin' and 'Land at Ystradowen' is that the LDP Proposals Map demonstrates that 'Land West of Maendy Road' is within a Special Landscape Area - see below:
Vale of Glamorgan Proposals Map (Land West of Maendy Road outlined in red
Under Policy MG17 'Special Landscape Areas' it is considered that development in SLA could pose an "unacceptable harm to the important landscape of the area". Accordingly, this development and proposed allocation could therefore cause "unacceptable harm to the important landscape of the area".

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any "unacceptable harm to the important landscape of the area".
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)
It is noted that the detailed assessment scores the site 'amber' in respect to Special Landscape Area (refer to / see later section for full details), with the assessment methodology setting out that "the site is located within a Special Landscape Area/The Glamorgan Heritage Coast and the development may result in little or no change in character and little or no significant effect on landscape character and visual amenity."
A detailed assessment of the impact upon the SLA in respect to the development of 'Land West of Maendy Road, Aberthin' should therefore be, and will need to be, undertaken as part of any planning application. If it is found that the site causes "unacceptable harm to the important landscape of the area", this will lead to this proposed allocation being at risk of not being delivered. This will be as a result of its impacts and acceptability at the planning application stage that the landscape and visual impact of development of the site is unacceptable. As such, these proposed affordable units are at a potential considerable risk of being lost and not satisfying the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" – which 'Land at Ystradowen (Site ID: 4060)' can do as it is not located in an SLA.

In addition the draft housing trajectory set out that "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" is not provided for. This is clearly an issue. Given

however 'Land at Ystradowen' does not sit within a SLA – and so not pose any potential concern or cause any "unacceptable harm to the important landscape of the area" – the allocation of this site would be more suitable and "safer" - as there would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for, and the need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" would be satisfied.

As mentioned previously, a detailed assessment and critique has now been undertaken of 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part evidence base for the Deposit Plan using the similar 'scoring' exercise. As such, it is again pertinent to consider and respond to the Council's 'scoring' exercise assessment of the site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part of these representations.

The 'Summary of Assessment of New Candidate Sites' table can be seen overleaf for reference:
BP18A Candidate Site Assessment at Deposit Plan Stage
A comparison between the site assessments undertaken for both 'Land West of Maendy Road, Aberthin (Site ID: 2299)' (on the left), and 'Land at Ystradowen (Site ID: 4060)' (on the right) has been undertaken, and can be seen below for reference:

Having undertaken a review of the scoring for both 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)', it is clear that 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)':

• 'Land at Ystradowen (Site ID: 4060)': 17/33 criteria are scored green = 52%

• 'Land West of Maendy Road, Aberthin (Site ID: 2299)': 12/34 criteria are scored green = 36%

It is clear therefore given the above that 'Land at Ystradowen (Site ID: 4060)' is a better site, and should be allocated accordingly.

One key example to note is how the criterion 'Access to Services and Facilities' has been scored. For 'Land at Ystradowen (Site ID: 4060)' this has been scored green, yet for 'Land West of Maendy Road, Aberthin (Site ID: 2299)', this has been scored red. Given this, this corroborates the position outlined previously above that, if the proposed allocated site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen (Site ID: 430 / 4060)' is equally as sustainable – in fact considered more suitable (given its higher scoring in this respect).

Furthermore, we question the "soundness" of the assessment of 'Land West of Maendy Road, Aberthin (Site ID: 2299)', given that 7/34 (21%) of the criteria do not appears to have not been assessed – i.e. 7/34 (21%) of the criteria are scored grey. This raises questions regarding the "soundness" of this site, given it appears this sites acceptability and inclusion was pre-determined.

It is clear therefore that if 'Land West of Maendy Road, Aberthin (Site ID: 2299)' has been deemed acceptable for allocation, yet 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than this site, 'Land at Ystradowen (Site ID: 4060)' should also be deemed acceptable and be allocated. Not least as the site is "proposed for a small-scale affordable housing led development in a minor rural settlement … would accord in principle with the strategy", and "could make an important contribution in meeting "a "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge".

Summary and Conclusion

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Deposit Plan published as part of the consultation.

In terms of SECTION 4, and a response to the Candidate Site Assessment at Deposit Plan Stage, the following key points have been made:

• The Council's 'Stage 2 Detailed Site Assessment' justification for 'Land at Ystradowen (Site ID: 4060)' is fundamentally incorrect;

• Given the material positive similarities between 'Land at Ystradowen (Site ID: 4060)' and 'Land West of Maendy Road, Aberthin (Site ID: 2299)', which has been deemed acceptable and allocated, 'Land at Ystradowen (Site ID: 4060)' should also be deemed acceptable and allocated accordingly;

• 'Land at Ystradowen (Site ID: 4060)' would help to alleviate and satisfy "a need for 230 additional affordable units over the next 15 years" within "the ward of Cowbridge"; and
• 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)', and so should also be deemed acceptable and be allocated;

Ultimately, 'Land at Ystradowen (Site ID: 4060)' is "proposed for a small-scale affordable housing led development in a minor rural settlement", and as such "would accord in principle with the strategy". It would therefore "make an important contribution in meeting" the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge".

We would therefore object the Council's assessment that the site is not considered suitable for development.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Credentials of this site subject to this submission; and
10. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing-led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the east of Coliwinston, Colwinston.

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the

consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• “Time period of pre-application discussions/PAC consultation” = 4 months
• “Time between submission of planning application and determination” = 6 months
• “Time taken from planning consent to the discharge of relevant conditions to enable site construction” = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of “6 months” given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within “4 months” as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicted in the ‘Timing and Phasing of Sites’ table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.
Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large ‘spike’ (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has

been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.
The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.
Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.
Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:
Table 6: Existing LDP allocations to be carried forward

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.
Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision.
Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".
As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision, and as such, to add a further site for housing over and

above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations

Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
Candidate Site Stage 2 Assessment (Site Ref. 404)
The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:
"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clearly evident deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Despite the absence of site-specific assessment criteria, as the RLDP preferred strategy states a key objective guiding site selection is that the Plan will "provide for vital and vibrant rural communities whilst protecting the countryside through the delivery of growth in sustainable locations related to the settlement hierarchy alongside the provision of supporting infrastructure" (Objective 7 'Fostering Diverse Vibrant and Connected Communities'), it is reasonable to assume that the Council considers 'Land West of Maendy Road' to be a 'sustainable' location.

Given this, we have reviewed the key services in proximity to the site. The following services were identified:

• In terms of public transport, there are two bus stops located approximately 0.2 miles (4-minute walk) from the site ('Land West of Maendy Road'), with the 321 providing services between Llantwit Major and Talbot Green.

• The site is also located 0.2 miles (4-minute walk) from The Farmers Arms Pub and 0.2 miles (4-minute walk) from The Hare and Hounds Inn.

• The site is located 0.2 miles (5-minute walk) from Aberthin Village Hall.

Aberthin is in close proximity (1.2 miles/14-minute walk) to the key settlement of Cowbridge - which is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Considering this, there is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms. Given that Ystradowen is located only 2.7 miles from Cowbridge (9- minute bus journey), the candidate site at 'Land at Ystradowen' is no less sustainable than the site at Aberthin. The following key services are within Ystradowen and therefore in close proximity to the promoted site:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin.
• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Accordingly, it can be considered therefore that if the proposed allocated site 'Land West of Maendy Road, Aberthin' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen' is equally suitable to be an Affordable Housing Led Allocation.
Furthermore, to reinforce the above position and to illustrate and evidence the site's sustainability, the following has been taken from the Officer's Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:
Reference is made in the Final Report of app ref. 2013/00856/OUT which states that "Ystradowen is considered a sustainable settlement for further housing development", due to "the sustainable nature of the settlement".

Furthermore, the Final Report of app ref. 2023/00948/FUL states:

• "Notwithstanding this, the site is located in close proximity to local services and there is a bus stop located nearby. Whilst the comments relating to the reliance and frequency of the bus services have been considered, there still remains a bus service in the area."
• "Firstly, as aforementioned, many neighbouring comments refer to the site as unsustainable and have commented on the suitability of public transport and cycle routes etc. This has been addressed above."

The above clearly evidences that the location has previously been endorsed as, and is currently still found to be, sustainable.

A further key consideration to note and one which does differentiate between the relative merits of the 'Land at Maendy Road, Aberthin' and 'Land at Ystradowen' is that the LDP Proposals Map demonstrates that 'Land West of Maendy Road' is within a Special Landscape Area - see overleaf:
Vale of Glamorgan Proposals Map (Land West of Maendy Road outlined in red)
Under Policy MG17 'Special Landscape Areas' it is considered that development in SLA could pose an "unacceptable harm to the important landscape of the area". Accordingly, this development and proposed allocation could therefore cause "unacceptable harm to the important landscape of the area".

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any "unacceptable harm to the important landscape of the area".
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)

This is a significant factor to consider. 'Land West of Maendy Road, Aberthin' causing "unacceptable harm to the important landscape of the area" will lead to this proposed allocation being at risk of not being delivered by virtue of detailed assessments of its impacts and acceptability at planning application stage holding that the landscape and visual impact of development of the site is unacceptable. As such 25 affordable units will be lost from the proposed affordable 122 units, and ultimately being lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" is not provided for. This is clearly an issue. Given however 'Land at Ystradowen' does not sit within a SLA – and so not pose any potential concern or cause any "unacceptable harm to the important landscape of the area" – the allocation of this site would be more suitable and "safer" - as therefore would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.
Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:
Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:
In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Ystradowen', the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below. With reference to the above:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green.

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities.

Furthermore, the settlement of Ystradowen has been ranked highly in the VoG Sustainable Settlements Appraisal, scoring a total of 14 points according to the distance to key services and facilities available. This places Ystradowen 26th out of a total of 87 settlements. As a result, this would be deemed a suitable area to accommodate growth.

As stated above the key settlement of Cowbridge is located in close proximity being only 2.7 miles to the south and a 9-minute bus journey. Cowbridge is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Furthermore, it is important to note that the above criteria does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant). These areas comprise for example the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Given the above, 'Land at Ystradowen' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Ystradowen' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.
Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref. 2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.
Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Credentials of this site subject to this submission

There has been a significant change in the position and circumstances since the promoted site herein was assessed at Candidate Site Stage and the Assessment undertaken. The Stage 2 Assessment of the site concluded the following: 'Whilst adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.' The assessment/conclusion implies that as this site ('Land off Sandy Lane, Ystradowen') has not been built out and is "currently under review", it suggests that 'Land at Ystradowen' (430) does not adjoin the existing LDP settlement boundary. Given recent developments however associated with the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024) and the site being currently being "built out" and work commencing on site, the site no longer adjoins "the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review". Accordingly, and given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.
The following specific photo evidences 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48) is being built out the western boundary of the promoted Site ID 430. This therefore clearly highlights that the site's boundary is representing the existing settlement limit in the existing development plan. Accordingly, the 'Land at Ystradowen' site boundary

therefore directly adjoins/is adjoining the existing LDP settlement boundary.
Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gr
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3gt
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g4
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g7
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3g8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gv
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gc

7060 Object

Document Element: HG4 - RURAL AFFORDABLE HOUSING LED SITES
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

As drafted, the Plan expects a great deal from a very limited rural supply offer. In our view, the objectives of the plan are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
We raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions.
The omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors

including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in

Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.

The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.

In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.

Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.

Policy SP6 – Housing Requirement Position: Object

Barratt Redrow objects to Policy SP6.

Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.

PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:

"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."

The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:

"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.

5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.

5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."

Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:

• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;

• Does not actively seek to address the area's ageing demographic;

• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.

In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.

That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.

The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.

This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.

The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.

There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.

A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.

The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.

The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a

1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans

Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.

Policy SP6 – Flexibility, housing land supply and trajectory Position: Object

Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.

The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.

In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.

The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.

The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.

Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.

The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.

There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.

In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.

Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part

Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.

The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.

That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.

There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.

The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.

In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.

Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part

Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.

The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.

In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses

the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.

8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.

The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.

Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:

• the Plan is overly reliant on a small number of key sites;

• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;

• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and

• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.

The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.

Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.

The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:

• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.

• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.

• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.

All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.

In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.

Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part

Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.

However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.

Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.

The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.

We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid

that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.
Policy CI1 – Open Space Provision
Position: Support in principle / Object in part
Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.
The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.
There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is

necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.
Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better

placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate

setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment
We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other

parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7061 Support

Document Element: HG4 - RURAL AFFORDABLE HOUSING LED SITES

Respondent: Barratt Redrow Homes [2669]

Agent: Highlight Planning

Summary:

Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited. The statements in policy HG4 and its supporting text show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and

that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a

Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."
The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.
5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the

resumption of long-term household formation trends.
In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.

The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.
Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part
Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate

that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.
That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.
There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.
The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.
In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.
Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.
The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be “informed” by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council’s latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan’s blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.
8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part
Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.
The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan’s supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about

unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;
• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.
The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding

consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.
Policy CI1 – Open Space Provision
Position: Support in principle / Object in part
Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.
The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.
There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.
Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy

Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan

recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open

spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment
We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm

Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7148 Object

Document Element: HG4 - RURAL AFFORDABLE HOUSING LED SITES
Respondent: Peter Stone Properties Ltd [1182]
Agent: Geraint John Planning Ltd

Summary:

It is not considered that this policy goes far enough to address the target and level of affordable housing need. Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to meet the target.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £800,000 over the last 12 months, there is a clear and established need for new homes in the Bonvilston area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of

settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Bonvilston. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)

• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute

to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so

quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The

contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites – not least given that 3 of the 4 allocated affordable housing-led sites are located west of Cowbridge.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land South of A48, Bonvilston (Site ID: 435 / 3857) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area (which Bonvilston is located within), and a need for 242 affordable homes in the Wenvoe housing market area. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

Securing further delivery of Affordable Units

As set out above, it can be assumed that the affordable housing-led allocated sites only provide 61no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included

within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to meet the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Bonvilston and the proposed site. As outlined within these representations, it is considered that the site (ID 435 / 3857) represents a sustainable, deliverable and acceptable site. This proposed allocation is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

• Cowbridge Comprehensive School;
• St Nicholas Primary School;
• Cowbridge Health Centre; and
• Cowbridge town centre for various Retail Services.

Accordingly, the settlement of Bonvilston represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Bonvilston, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy

and the criteria listed out in the policy is generally supported.

That said, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 "For the purposes of this policy, 'small-scale' will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites

with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

Deliverability of the Site

In summary, the site seeks to deliver the following key elements:

• In summary, the opportunity of the site seeks to deliver:
• Residential development comprising up to 25 dwellings, with at least 50% affordable housing in accordance with Policy SP2,
• Highways infrastructure within the site;
• Upgraded access to the site;
• Strong legible pedestrian and cycle connections throughout the site and with the existing settlement;
• Green Infrastructure; and
• Sustainable Drainage Systems (SuDS).

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land South of the A48, Bonvilston (Site ID: 3857) sets out that the position of the site at the Deposit Stage is as follows:

"Notwithstanding the amendment from a market led to an affordable housing led scheme (original CS 435), the other reasons why the site was previously discounted still remain.
The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area.
Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48.
The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable. There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing."
Conservation Area
In terms of the assertion that "The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area, this is strongly disputed.

Whilst it is acknowledged that the site lies within the Bonvilston Conservation Area, the conclusion that it would be adversely affected is not considered to be accurate. Firstly, the site as it currently stands, consists of an open field. This does not match the conservation area which is characterised primarily by residential dwellings of varying densities, and as such, it is considered that development of the site with sensitively designed buildings would enhance as opposed to harming its surroundings.

Secondly, the large residential development to the north of the site, 'Land at Sycamore Cross' ref. 2015/00960/FUL encroaches on the Bonvilston Conservation area but was deemed acceptable by the LPA. Although not all of the site is within the Conservation Area, it's encroachment and presence adjoining and surrounding a large proportion of the area is considerable and was deemed acceptable by Officers in 2017. Given this, a development at the Land South of the A48 should be deemed acceptable, as it follows the same principles albeit at a much smaller scale.

Highways
As for the statement that "Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48", this is also strongly disputed.

The site is located immediately adjacent to the adopted highway where it is proposed to upgrade and enhance the existing gated access point. Due to the existing access point, it is not considered that 'major' highway mitigation works would be needed, rather this would be enhanced and improved as part of the proposed development. Furthermore, given the nature of the road, with long views extending in both directions, it is anticipated that appropriate visibility

splays could be achieved to enable safe access and egress. As such, it is considered that the site would achieve appropriate highway access within the need for "major" highway mitigation works.

Agricultural Land Classification
The Detailed Site Assessment also sets out that "The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable." This is strongly disputed.

A review of the Agricultural Land Classification Predictive Map indicates that the site lies primarily within 'Grade 2: Very

good quality agricultural land' but no Grade 1 land is present. Further assessment and tests to establish the quality would therefore be undertaken in due course to confirm the quality of the land. However, it is not considered that it would be suitable to farm in any event given the location immediately adjoining existing residential development and the fact that it is within private ownership. Overall, given that the site is relatively small with a gross area of 0.88 hectares, it is not considered that its development would result in a detrimental or significant loss of agricultural land – not least given that site is not capable of beneficial agricultural production due to its limited size.

Housing / Housing Land
Further to the above, it is also set out that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing", however, this is not considered to be entirely accurate.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area and a need for 242 affordable homes in the Wenvoe housing market area. This need has not been met through the allocations of sites within the RLDP, nor has it been met through outstanding commitments.

As outlined in Annex 1, it can be assumed that the affordable housing-led allocated sites will only provide for 61no. affordable dwellings within the Rural Vale, comprising 4no. sites that are expected to deliver approximately 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. Therefore, more sites should be allocated in order to secure the delivery of a higher number of affordable housing units to meet the target.

As set out within Annex 1, it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, however, there is serious concern regarding the deliverability of these sites, which would result in a significant gap in the total affordable housing that is delivered. Therefore, allocating a greater number of affordable housing-led sites would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in the both the overall affordable housing need, and the need for the St Nicholas & Llancarfan housing market area, being unmet, with demand continuing to outstrip supply.

The LHMA 2023 sets out the existing stock and planned supply of affordable housing over the next 5 years (up until 2028). This assessment found that the housing market area of St Nicholas & Llancarfan has a committed supply of 4no. one beds, 11no. two beds, and 3no. three beds, with 2 no. three beds as expected re-lets. The assessment also identifies a committed supply of 39no. units for intermediate housing.

The LHMA also sets out the existing stock and planned supply for Wenvoe, identifying the committed supply of social rent homes to be 12no. one beds, 11no. two beds, and 5no. three beds, with 7no. one beds and 8no. two beds as expected re-lets. There is no committed supply for intermediate housing in Wenvoe.

It should be noted that the development of 'Land East of Nicholas' (Campbell Court and Cae Newydd), has now been completed, and as such, can not form part of the housing land available. The latest Pre-Application Response for the site subject to these representations (Land South of the A48, Bonvilston) accounted for the development of the site in

St Nicholas, stating that "even after the developments at St Nicholas and Culverhouse Cross, there was the need in the Wenvoe ward for 1 Bed 71, 2 Bed 49, 3 Bed 29, 4 Bed 7, 5 Bed 5, Total 161".

It should also be noted that there are existing commitments within the Bonvilston area ('Land to the east of Bonvilston'), however, the deliverability of the existing commitment is seriously questioned. Application Ref. 2015/00960/FUL was approved in July 2017, with the Housing Land Supply and Housing Trajectory Report (December 2025) confirming that of the total 120 units permitted, only 40 had completed by 1st April 2025, with the remaining 80 units not started by this same date. Of the 80 units not started, 25 units are affordable homes.

It is well known that phase 1 of the development at 'Land to the east of Bonvilston' has faced difficulties which has led to the development remaining incomplete. This does of course put into question the overall deliverability of the site, and raises concerns about the units that were, and still are, required within the Bonvilston area.

The allocation of the site promoted herein would not only help in the short term in meeting the overall affordable housing target for the Plan, but would also assist in meeting the unmet needs of affordable housing within Bonvilston – not least given the serious concern regarding the deliverability of the committed supply of housing within the St Nicholas & Llancarfan housing market area.

For the reasons set out above, and in light of the information provided within the LHMA 2023 and the Housing Land Supply and Housing Trajectory Report (December 2025), it is evident that there is considerable need for affordable housing within Bonvilston, and accordingly, the housing market areas of St Nicholas & Llancarfan, and Wenvoe. There have not been any sites allocated to assist within meeting the local need, and more sites should be allocated in order to secure delivery of a higher number of affordable housing units to meet the overall target of the Plan.

The contention that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing" is therefore strongly disputed – not least given that there is a clear and evident need to

allocate more affordable housing-led sites in order to meet the target set out in the Plan.

Interim Summary

In summary, it is considered that the site subject to these representations would not have an adverse impact on the character and setting of the Bonvilston Conservation Area, nor would major highway mitigation works be required to enable safe vehicular access on to the A48. Moreover, it is considered that the site's classification as BMV Agricultural Land does not pose a fundamental constraint to development – as the site represents a relatively small parcel with a gross area of 0.88 hectares, which is not capable of beneficial agricultural production due to its limited size.

There is also a considerable need for the affordable housing in Bonvilston and the housing market area of St Nicholas & Llancarfan. The site promoted herein would assist in meeting these local needs and should be allocated accordingly.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage

As demonstrated above, there has only been one change to the scoring attributed to the site, this being a change from 'red' to 'amber' for 'Developer Interest'. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with these representations accordingly (see Appendix B).

Whilst detailed submissions were made on the previous assessment, it is considered pertinent for the scoring of the key criteria's to be addressed as part of these representations. As such, these have also been discussed below.
Developer Interest

As set out above, the Detailed Site Assessment for 'Developer Interest' has changed from 'red' to 'amber'. The assessment methodology for this section of the assessment has been extracted below for reference.

As set out above, 'amber' refers to there being no development interest identified at this stage, however, there is evidence to indicate that the site is being actively promoted by the owners.

The representations made to the Preferred Strategy (Appendix B) sets out that whilst the site does not yet have an agreement with a developer to take on the land, it is considered that this would be achieved should the site be allocated, and planning permission granted. Newydd Housing association have been engaged previously and had agreed to take the site forward as a 100% affordable scheme, albeit is also considered that they could take on the affordable units as part of a mixed tenure scheme.

In addition to Newydd, the site promoter has also received an offer from a private social housing provider who would be prepared to support the site as a mixed tenure scheme.

This position has not changed since the Preferred Strategy stage, and is considered that there is continued developer interest for the site. This is not considered to change at any point – not least given the discussions held between the owners of the site in questions and developers of interest.

Environmental and Physical Constraints

As set out at the Pre-Application Stage. the site underwent a Preliminary Ecological Appraisal in September 2022 which identified that whilst some precautionary measures were recommended in terms of protecting priority habitats and reptiles, the site is not fundamentally constrained from development on ecological terms. Given this, it is considered that further ecological surveys would be undertaken at the planning stage to inform any development proposals and ensure the safeguarding of the natural environment.

Access to Key Services (Retail, Primary Schools, and Health Services) and to Services and Facilities

As set out within the representations made to the Preferred Strategy, the site is located within a maximum of a 20-minute bus journey to a version of every key service listed, due to the proximity of the site to settlements such as Cowbridge, Culverhouse Cross and St Nicholas. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Bonvilston without the need to travel by car.

To reiterate, the site 'Land South of the A48, Bonvilston' is situated in proximity to Cowbridge, Culverhouse Cross and

Cardiff, which comprise all key services. Concluding this allocation as 'unsustainable' in regard to 'availability of local facilities in and around settlements' is not accurate. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

• Cowbridge Comprehensive School;
• St Nicholas Primary School;
• Cowbridge Health Centre; and
• Cowbridge town centre for various Retail Services.

It should also be noted that Bonvilston contains a number of facilities within a short and level walking distance of the site, including the village shop and Café, as well as the Red Lion Public House.

Given the accessibility of the site to other settlements, and the fact that these are made accessible by bus and active travel routes, it is considered that the site should be concluded as sustainable in regard to access to key services.

Summary and Conclusion

As evidenced above, and within the representations made to the Preferred Strategy (Appendix B), there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location, and site, are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston.

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicated in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.

Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed

for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above the site was not considered suitable for further consideration with the site scoring negatively (red) in a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale

affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site has been outlined as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Land South of A48, Bonvilston.

Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3jp
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3kr
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k3
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k6
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kf
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kh
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z5

7149 Comment

Document Element: HG4 - RURAL AFFORDABLE HOUSING LED SITES
Respondent: Peter Stone Properties Ltd [1182]
Agent: Geraint John Planning Ltd

Summary:

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land South of A48, Bonvilston (Site ID: 435 / 3857) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £800,000 over the last 12 months, there is a clear and established need for new homes in the Bonvilston area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Bonvilston. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a

new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between

Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was

25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites – not least given that 3 of the 4 allocated affordable housing-led sites are located west of Cowbridge.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land South of A48, Bonvilston (Site ID: 435 / 3857) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area (which Bonvilston is located within), and a need for 242 affordable homes in the Wenvoe housing market area. As such, there is an identified need for affordable housing in this area, something which the site could address through an

allocation.

Securing further delivery of Affordable Units

As set out above, it can be assumed that the affordable housing-led allocated sites only provide 61no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included

within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to meet the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Bonvilston and the proposed site. As outlined within these representations, it is considered that the site (ID 435 / 3857) represents a sustainable, deliverable and acceptable site. This proposed allocation is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

• Cowbridge Comprehensive School;
• St Nicholas Primary School;
• Cowbridge Health Centre; and
• Cowbridge town centre for various Retail Services.

Accordingly, the settlement of Bonvilston represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Bonvilston, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a ‘cap’ of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a ‘cap’ limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 “For the purposes of this policy, ‘small-scale’ will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites

with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area.”

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater

flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

Deliverability of the Site

In summary, the site seeks to deliver the following key elements:

• In summary, the opportunity of the site seeks to deliver:
• Residential development comprising up to 25 dwellings, with at least 50% affordable housing in accordance with Policy SP2,
• Highways infrastructure within the site;
• Upgraded access to the site;
• Strong legible pedestrian and cycle connections throughout the site and with the existing settlement;
• Green Infrastructure; and
• Sustainable Drainage Systems (SuDS).

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land South of the A48, Bonvilston (Site ID: 3857) sets out that the position of the site at the Deposit Stage is as follows:

"Notwithstanding the amendment from a market led to an affordable housing led scheme (original CS 435), the other reasons why the site was previously discounted still remain.
The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area.
Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48.
The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable. There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing."
Conservation Area
In terms of the assertion that "The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area, this is strongly disputed.

Whilst it is acknowledged that the site lies within the Bonvilston Conservation Area, the conclusion that it would be adversely affected is not considered to be accurate. Firstly, the site as it currently stands, consists of an open field. This does not match the conservation area which is characterised primarily by residential dwellings of varying densities, and as such, it is considered that development of the site with sensitively designed buildings would enhance as opposed to harming its surroundings.

Secondly, the large residential development to the north of the site, 'Land at Sycamore Cross' ref. 2015/00960/FUL encroaches on the Bonvilston Conservation area but was deemed acceptable by the LPA. Although not all of the site is within the Conservation Area, it's encroachment and presence adjoining and surrounding a large proportion of the area is considerable and was deemed acceptable by Officers in 2017. Given this, a development at the Land South of the A48 should be deemed acceptable, as it follows the same principles albeit at a much smaller scale.

Highways
As for the statement that "Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48", this is also strongly disputed.

The site is located immediately adjacent to the adopted highway where it is proposed to upgrade and enhance the existing gated access point. Due to the existing access point, it is not considered that 'major' highway mitigation works would be needed, rather this would be enhanced and improved as part of the proposed development. Furthermore, given the nature of the road, with long views extending in both directions, it is anticipated that appropriate visibility

splays could be achieved to enable safe access and egress. As such, it is considered that the site would achieve appropriate highway access within the need for "major" highway mitigation works.

Agricultural Land Classification
The Detailed Site Assessment also sets out that "The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable." This is strongly disputed.

A review of the Agricultural Land Classification Predictive Map indicates that the site lies primarily within 'Grade 2: Very good quality agricultural land' but no Grade 1 land is present. Further assessment and tests to establish the quality would therefore be undertaken in due course to confirm the quality of the land. However, it is not considered that it would be suitable to farm in any event given the location immediately adjoining existing residential development and the fact that it is within private ownership. Overall, given that the site is relatively small with a gross area of 0.88 hectares, it is not considered that its development would result in a detrimental or significant loss of agricultural land – not least given that site is not capable of beneficial agricultural production due to its limited size.

Housing / Housing Land
Further to the above, it is also set out that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing", however, this is not considered to be entirely accurate.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area and a need for 242 affordable homes in the Wenvoe housing market area. This need has not been met through the allocations of sites within the RLDP, nor has it been met through outstanding commitments.

As outlined in Annex 1, it can be assumed that the affordable housing-led allocated sites will only provide for 61no. affordable dwellings within the Rural Vale, comprising 4no. sites that are expected to deliver approximately 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. Therefore, more sites should be allocated in order to secure the delivery of a higher number of affordable housing units to meet the target.

As set out within Annex 1, it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, however, there is serious concern regarding the deliverability of these sites, which would result in a significant gap in the total affordable housing that is delivered. Therefore, allocating a greater number of affordable housing-led sites would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in the both the overall affordable housing need, and the need for the St Nicholas & Llancarfan housing market area, being unmet, with demand continuing to outstrip supply.

The LHMA 2023 sets out the existing stock and planned supply of affordable housing over the next 5 years (up until 2028). This assessment found that the housing market area of St Nicholas & Llancarfan has a committed supply of 4no. one beds, 11no. two beds, and 3no. three beds, with 2 no. three beds as expected re-lets. The assessment also identifies a committed supply of 39no. units for intermediate housing.

The LHMA also sets out the existing stock and planned supply for Wenvoe, identifying the committed supply of social rent homes to be 12no. one beds, 11no. two beds, and 5no. three beds, with 7no. one beds and 8no. two beds as expected re-lets. There is no committed supply for intermediate housing in Wenvoe.

It should be noted that the development of 'Land East of Nicholas' (Campbell Court and Cae Newydd), has now been completed, and as such, can not form part of the housing land available. The latest Pre-Application Response for the site subject to these representations (Land South of the A48, Bonvilston) accounted for the development of the site in

St Nicholas, stating that "even after the developments at St Nicholas and Culverhouse Cross, there was the need in the Wenvoe ward for 1 Bed 71, 2 Bed 49, 3 Bed 29, 4 Bed 7, 5 Bed 5, Total 161".

It should also be noted that there are existing commitments within the Bonvilston area ('Land to the east of Bonvilston'), however, the deliverability of the existing commitment is seriously questioned. Application Ref. 2015/00960/FUL was approved in July 2017, with the Housing Land Supply and Housing Trajectory Report (December 2025) confirming that of the total 120 units permitted, only 40 had completed by 1st April 2025, with the remaining 80 units not started by this same date. Of the 80 units not started, 25 units are affordable homes.

It is well known that phase 1 of the development at 'Land to the east of Bonvilston' has faced difficulties which has led to the development remaining incomplete. This does of course put into question the overall deliverability of the site, and raises concerns about the units that were, and still are, required within the Bonvilston area.

The allocation of the site promoted herein would not only help in the short term in meeting the overall affordable housing target for the Plan, but would also assist in meeting the unmet needs of affordable housing within Bonvilston – not least given the serious concern regarding the deliverability of the committed supply of housing within the St Nicholas & Llancarfan housing market area.

For the reasons set out above, and in light of the information provided within the LHMA 2023 and the Housing Land Supply and Housing Trajectory Report (December 2025), it is evident that there is considerable need for affordable housing within Bonvilston, and accordingly, the housing market areas of St Nicholas & Llancarfan, and Wenvoe. There have not been any sites allocated to assist within meeting the local need, and more sites should be allocated in order to secure delivery of a higher number of affordable housing units to meet the overall target of the Plan.

The contention that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing" is therefore strongly disputed – not least given that there is a clear and evident need to allocate more affordable housing-led sites in order to meet the target set out in the Plan.

Interim Summary

In summary, it is considered that the site subject to these representations would not have an adverse impact on the character and setting of the Bonvilston Conservation Area, nor would major highway mitigation works be required to enable safe vehicular access on to the A48. Moreover, it is considered that the site's classification as BMV Agricultural Land does not pose a fundamental constraint to development – as the site represents a relatively small parcel with a gross area of 0.88 hectares, which is not capable of beneficial agricultural production due to its limited size.

There is also a considerable need for the affordable housing in Bonvilston and the housing market area of St Nicholas & Llancarfan. The site promoted herein would assist in meeting these local needs and should be allocated accordingly.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage

As demonstrated above, there has only been one change to the scoring attributed to the site, this being a change from 'red' to 'amber' for 'Developer Interest'. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with these representations accordingly (see Appendix B).

Whilst detailed submissions were made on the previous assessment, it is considered pertinent for the scoring of the key criteria's to be addressed as part of these representations. As such, these have also been discussed below.
Developer Interest

As set out above, the Detailed Site Assessment for 'Developer Interest' has changed from 'red' to 'amber'. The assessment methodology for this section of the assessment has been extracted below for reference.

As set out above, 'amber' refers to there being no development interest identified at this stage, however, there is evidence to indicate that the site is being actively promoted by the owners.

The representations made to the Preferred Strategy (Appendix B) sets out that whilst the site does not yet have an agreement with a developer to take on the land, it is considered that this would be achieved should the site be allocated, and planning permission granted. Newydd Housing association have been engaged previously and had agreed to take the site forward as a 100% affordable scheme, albeit is also considered that they could take on the affordable units as part of a mixed tenure scheme.

In addition to Newydd, the site promoter has also received an offer from a private social housing provider who would be prepared to support the site as a mixed tenure scheme.

This position has not changed since the Preferred Strategy stage, and is considered that there is continued developer interest for the site. This is not considered to change at any point – not least given the discussions held between the owners of the site in questions and developers of interest.

Environmental and Physical Constraints

As set out at the Pre-Application Stage. the site underwent a Preliminary Ecological Appraisal in September 2022 which identified that whilst some precautionary measures were recommended in terms of protecting priority habitats and reptiles, the site is not fundamentally constrained from development on ecological terms. Given this, it is considered that further ecological surveys would be undertaken at the planning stage to inform any development proposals and ensure the safeguarding of the natural environment.

Access to Key Services (Retail, Primary Schools, and Health Services) and to Services and Facilities

As set out within the representations made to the Preferred Strategy, the site is located within a maximum of a 20-minute bus journey to a version of every key service listed, due to the proximity of the site to settlements such as Cowbridge, Culverhouse Cross and St Nicholas. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Bonvilston without the need to travel by car.

To reiterate, the site 'Land South of the A48, Bonvilston' is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Concluding this allocation as 'unsustainable' in regard to 'availability of local facilities in and around settlements' is not accurate. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

• Cowbridge Comprehensive School;
• St Nicholas Primary School;
• Cowbridge Health Centre; and
• Cowbridge town centre for various Retail Services.

It should also be noted that Bonvilston contains a number of facilities within a short and level walking distance of the site, including the village shop and Café, as well as the Red Lion Public House.

Given the accessibility of the site to other settlements, and the fact that these are made accessible by bus and active travel routes, it is considered that the site should be concluded as sustainable in regard to access to key services.

Summary and Conclusion

As evidenced above, and within the representations made to the Preferred Strategy (Appendix B), there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location, and site, are inherently suitable and deliverable, and will make a significant

contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston.

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicated in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 –

2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document "New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.

Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these

changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

“A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth.”

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the ‘Rectory Field, St Brides Road’ site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

‘Land West of Maendy Road’ has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the ‘Candidate Assessment at Preferred Strategy Stage’ (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the “soundness” of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is “sound” (i.e. its allocation is considered to be “unsound”).

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of ‘Land to north and west of Westwinds Business Park’:

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above the site was not considered suitable for further consideration with the site scoring negatively (red) in a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;

• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale

affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site has been outlined as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is

a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Land South of A48, Bonvilston.

Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3jp
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3kr
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k3
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k6
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kf
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kh
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z5

7167 Object

Document Element: HG4 - RURAL AFFORDABLE HOUSING LED SITES
Respondent: Wig Fach Property Company Ltd [2373]
Agent: Geraint John Planning Ltd

Summary:

It is not considered that this policy goes far enough to address the target and level of affordable housing need. Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to meet the target.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ogmore By Sea area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county,

and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either Key Settlement, Service Centre settlement or Primary Settlements, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Ogmore By Sea. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the

north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to

deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan

within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that the should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 124 affordable homes in the St Brides Major local housing market area (which Ogmore is located within). As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

It is questionable whether Wick has the capacity to accommodate 50 new dwellings, given the sustainability and rural nature of the area. As a result, it is suggested that the number of homes allocated in Wick is reduced and that a further allocation in St Brides Major is secured, in order to facilitate supporting the delivery of affordable housing through the housing market area, rather than in one minor rural settlement. The sustainability of Ogmore has been assessed, both by the Council through the Sustainability Appraisal and again, through our assessment of the site.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a

target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4 % of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.

Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the

Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ogmore and the proposed site. As outlined within these representations, it is considered that the site (ID xxx) represents a sustainable, deliverable and acceptable site. The site is within a maximum of a 22- minute bus journey to a every key service listed, due to the proximity of the site to settlements such as Bridgend. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Ogmore By Sea without the need to travel by car. The site is located within 5 miles of Bridgend, and within a maximum 22-minute bus journey of the following services:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre for various Retail Services

Moreover, Ogmore has benefitted from the recent development of the Ogmore By Sea Village Hall, which provides space for community activities and events to take place. The hall also includes a coffee shop (Welsh Coffee Company), which only adds further to the daily services provision available within the settlement. Access to the hall and coffee shop is directly provided for pedestrians from the Main Road, which allows for direct access from the site.

Accordingly, the settlement of Ogmore represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

It is acknowledged that the site also lies within the Glamorgan Heritage Coast and this point is addressed further below.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ogmore By Sea, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a ‘cap’ of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a ‘cap’ limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 “For the purposes of this policy, ‘small-scale’ will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area.”

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

Policy DNP3 – Glamorgan Heritage Coast

Given that the site is located in the Glamorgan Heritage Coast, it is noted that the following policy is of relevance to any future development on the site. Criteria 4 of Policy DNP3 states:

"The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development that accords with National Policy."
It is also noted that supporting Para 6.422 "In seeking to protect the Glamorgan Heritage Coast, the Council acknowledges that there are some built up areas within the boundary, including the Minor Rural Settlement of Ogmore. In addition, the Vale of Glamorgan rail line crosses part of the Heritage Coast designation in the location where a new station at St Athan is proposed. Whilst being mindful of the need to protect the special qualities of the Glamorgan Heritage Coast, the Council accepts that development within these areas is appropriate, subject to relevant policies of the Plan"(GJP emphasis).

We would offer general support for this policy, and consider this to provide flexibility which allows for certain forms of development. However, we would suggest that the policy wording should be amended to reflect that 'housing' should be supported in the Glamorgan Heritage Coast, providing that the policy exceptions are met. Therefore, the following amendment is proposed as part of the policy should be changed to include "small scale housing" or something similar. The proposed amendments to Policy DNP3 are outlined below in red:

"The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development, including small-scale housing proposals that accords with National Policy."

Again, this would ensure that suitable housing developments can be delivered in the Plan period, to meet the housing needs of the Vale of Glamorgan – particularly in respect of affordable housing.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to Policy DNP3 – Glamorgan Heritage Coast, given the lack of recognition for the potential for small-scale housing proposals;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site

Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land at Hazelwood, Ogmore By Sea (Site ID: 3855) sets out that the position of the site at the Deposit Stage is as follows:

"The original site as ruled out as the development would represent unacceptable intrusion in to the open countryside. Whilst the site has now been identified for an affordable housing led development, the original reason for ruling it out still remains."
In terms of the assertion that "the development would represent an unacceptable intrusion into to the open countryside", this is strongly disputed, in that the development of the site would represent a natural rounding off of the existing settlement boundary. An extract of the site relative to the settlement boundary is provided below, which clearly shows that the development of the site would not extend beyond the existing settlement pattern that exists in Ogmore.

Site Outlined in Red and Settlement Shaded in Blue
As clearly demonstrated in the above mapping, the site would extend no further eastwards than the existing housing area to the south of the site. Equally, the site would not be extending any further north than the existing settlement pattern in Ogmore. This position is further supported by the wider aerial view of the site provided overleaf:

Wider Aerial View of Site Outlined in Red and Settlement Shaded in Blue

In summary, it is considered that the proposed allocation of the site represents a logical rounding off of the existing settlement, as depicted in the mapping provided above – where the site follows the existing envelope of the settlement. The site does not extend any further eastwards than the established built form located immediately to the south; indeed, it sits comfortably within the same development line.

As such, it cannot be considered that the site represents an 'intrusion' into the countryside, as the site would be visually and functionally related to the settlement. It therefore follows that the site would be read as part of the settlement, and not the wider rural landscape.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage
As demonstrated above, there are no changes to the scoring attributed to the site. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with this submission (see Appendix A).

Sustainability

Notwithstanding the above, it is considered that the site represents a more sustainable location than what was previously assessed at Preferred Strategy stage, in light of the Ogmore by Sea Hall development. The Hall acts as a community facility, whereby the space is available for hire by local community groups such as birthday parties, weddings, group meetings, and other such similar uses. Moreover, a café (Welsh Coffee Co) is located within the premises which sells both food and drink.

The hall and café are within walking distance to and from the site, where new access facilities have been implemented from Main Road directly to the building, to allow access for pedestrians and cyclists. This is illustrated in the image below:

Walking and Cycling Facilities

The Tusker Rock pub and post office are also located along Main Road, all of which are within walking distance to the site.

Accordingly, the site is well served by new amenities (i.e. community hall) that comprehensively improves the sustainability of the site / settlement, and in turn, improves the sustainability credentials of the site promotion. It therefore follows that the site represents an acceptable location for residential development, and the site should be looked upon favourably accordingly.

It is also the case, as set out in previous representations, that the site is within a maximum 22-minuted bus journey of the following services and facilities:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre.

As such, key services and facilities can be access by sustainable travel over and above the existing level of provision available in Ogmore By Sea (as discussed above).

Accordingly, the relevant 'red' scorings in the Council's assessment should be updated to reflect the site's suitability and sustainability to accommodate the proposed residential development of the site.

Glamorgan Heritage Coast

Insofar as to the position regarding the site's location within the Glamorgan Heritage Coast, detailed submissions are made not only in the Preferred Strategy representations, but also in Annex 1 of this submission. In short, given the pressing need for such development (particularly affordable housing) to come forward in the Plan period to meet ever-increasing needs, development of this nature should be considered more favourably – not least that, as outlined in this Annex, the site would not extend any further that the existing settlement boundary.

Accordingly, the site would be perceived to form part of the settlement of Ogmore By Sea, and not the wider landscape, and therefore, would not have any detrimental impact on the Heritage Coast in any respect. The scoring should be amended accordingly to reflect this position.

Climate Change

As outlined in previous representations, the development will incorporate climate change measures, such as EV charging points, PV panels, as well as adopting sustainable materials for construction whilst maximising the potential for the dwellings to be energy efficient. Accordingly, the development will be built to high sustainable standards, and therefore, the scoring of the site should be amended as a result.

Summary and Conclusion

It has been evidenced above that there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;

6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston;

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicated in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document "New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report

(September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be

applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.

Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable

transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and

• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale

affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Hazelwood, Ogmore By Sea, the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below.

With reference to the above:

• In terms of public transport, there are two bus stops located approximately 200m (3-minute walk) from the site ('Ogmore By Sea Post Office'), with the '303' providing services between Llantwit Major and Bridgend.

• The site is located 200m (3-minute walk) from the 'Ogmore By Sea Post Office' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

• The site is also located 50m (1-minute walk) from a children's park.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities. This

Furthermore, the settlement of Ogmore By Sea has been ranked higher than Llangan (which the site 'Land to north and west of Westwinds Business Park' is located within) in the VoG Sustainable Settlements Appraisal, and therefore, is considered to constitute a more sustainable location to accommodate residential growth. Most notably, Ogmore By Sea scores '13' in respect to 'Daily Facilities' whereas Llangan only scores '3', evidencing that residents in Ogmore have much better access to services within the locality as compared to Llangan.

Given the above, 'Land at Hazelwood, Ogmore' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Hazelwood, Ogmore' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help

sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3zt
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3z4
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z6
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3z8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zv
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zc
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zw

7168 Comment

Document Element: HG4 - RURAL AFFORDABLE HOUSING LED SITES
Respondent: Wig Fach Property Company Ltd [2373]
Agent: Geraint John Planning Ltd

Summary:

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land at Ogmore By Sea (Site ID: 386 & 3855) also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. It is questionable whether Wick has the capacity to accommodate 50 new dwellings, given the sustainability and rural nature of the area. As a result, it is suggested that the number of homes allocated in Wick is reduced and that a further allocation in St Brides Major is secured, in order to facilitate supporting the delivery of affordable housing through the housing market area, rather than in one minor rural settlement.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ogmore By Sea area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to

these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either Key Settlement, Service Centre settlement or Primary Settlements, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Ogmore By Sea. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such

applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land

at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which

represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that the should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 124 affordable homes in the St Brides Major local housing market area (which Ogmore is located within). As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

It is questionable whether Wick has the capacity to accommodate 50 new dwellings, given the sustainability and rural nature of the area. As a result, it is suggested that the number of homes allocated in Wick is reduced and that a further allocation in St Brides Major is secured, in order to facilitate supporting the delivery of affordable housing through the

housing market area, rather than in one minor rural settlement. The sustainability of Ogmore has been assessed, both by the Council through the Sustainability Appraisal and again, through our assessment of the site.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a

target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4 % of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.

Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ogmore and the proposed site. As outlined within these representations, it is considered that the site (ID xxx) represents a sustainable, deliverable and acceptable site. The site is within a maximum of a 22- minute bus journey to a every key service listed, due to the proximity of the site to settlements such as Bridgend. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Ogmore By Sea without the need to travel by car. The site is located within 5 miles of Bridgend, and within a maximum 22-minute bus journey of the following services:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre for various Retail Services

Moreover, Ogmore has benefitted from the recent development of the Ogmore By Sea Village Hall, which provides space for community activities and events to take place. The hall also includes a coffee shop (Welsh Coffee Company), which only adds further to the daily services provision available within the settlement. Access to the hall and coffee shop is directly provided for pedestrians from the Main Road, which allows for direct access from the site.

Accordingly, the settlement of Ogmore represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

It is acknowledged that the site also lies within the Glamorgan Heritage Coast and this point is addressed further below.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ogmore By Sea, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a ‘cap’ of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a ‘cap’ limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 “For the purposes of this policy, ‘small-scale’ will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area.”

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

Policy DNP3 – Glamorgan Heritage Coast

Given that the site is located in the Glamorgan Heritage Coast, it is noted that the following policy is of relevance to any future development on the site. Criteria 4 of Policy DNP3 states:

“The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development that accords with National Policy.”
It is also noted that supporting Para 6.422 “In seeking to protect the Glamorgan Heritage Coast, the Council acknowledges that there are some built up areas within the boundary, including the Minor Rural Settlement of Ogmore. In addition, the Vale of Glamorgan rail line crosses part of the Heritage Coast designation in the location where a new station at St Athan is proposed. Whilst being mindful of the need to protect the special qualities of the Glamorgan Heritage Coast, the Council accepts that development within these areas is appropriate, subject to relevant policies of the Plan”(GJP emphasis).

We would offer general support for this policy, and consider this to provide flexibility which allows for certain forms of development. However, we would suggest that the policy wording should be amended to reflect that ‘housing’ should be supported in the Glamorgan Heritage Coast, providing that the policy exceptions are met. Therefore, the following amendment is proposed as part of the policy should be changed to include “small scale housing” or something similar. The proposed amendments to Policy DNP3 are outlined below in red:

“The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development, including small-scale housing proposals that accords with National Policy.”

Again, this would ensure that suitable housing developments can be delivered in the Plan period, to meet the housing needs of the Vale of Glamorgan – particularly in respect of affordable housing.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in ‘Annex 2’ of our representations, the site has overcome the ‘constraints’ set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the “soundness” of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan’s housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;

• Object to Policy DNP3 – Glamorgan Heritage Coast, given the lack of recognition for the potential for small-scale housing proposals;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land at Hazelwood, Ogmore By Sea (Site ID: 3855) sets out that the position of the site at the Deposit Stage is as follows:

"The original site as ruled out as the development would represent unacceptable intrusion in to the open countryside. Whilst the site has now been identified for an affordable housing led development, the original reason for ruling it out still remains."
In terms of the assertion that "the development would represent an unacceptable intrusion into to the open countryside", this is strongly disputed, in that the development of the site would represent a natural rounding off of the existing settlement boundary. An extract of the site relative to the settlement boundary is provided below, which clearly shows that the development of the site would not extend beyond the existing settlement pattern that exists in Ogmore.

Site Outlined in Red and Settlement Shaded in Blue
As clearly demonstrated in the above mapping, the site would extend no further eastwards than the existing housing area to the south of the site. Equally, the site would not be extending any further north than the existing settlement pattern in Ogmore. This position is further supported by the wider aerial view of the site provided overleaf:

Wider Aerial View of Site Outlined in Red and Settlement Shaded in Blue

In summary, it is considered that the proposed allocation of the site represents a logical rounding off of the existing settlement, as depicted in the mapping provided above – where the site follows the existing envelope of the settlement. The site does not extend any further eastwards than the established built form located immediately to the south; indeed, it sits comfortably within the same development line.

As such, it cannot be considered that the site represents an 'intrusion' into the countryside, as the site would be visually and functionally related to the settlement. It therefore follows that the site would be read as part of the settlement, and not the wider rural landscape.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage
As demonstrated above, there are no changes to the scoring attributed to the site. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in

conjunction with this submission (see Appendix A).

Sustainability

Notwithstanding the above, it is considered that the site represents a more sustainable location than what was previously assessed at Preferred Strategy stage, in light of the Ogmore by Sea Hall development. The Hall acts as a community facility, whereby the space is available for hire by local community groups such as birthday parties, weddings, group meetings, and other such similar uses. Moreover, a café (Welsh Coffee Co) is located within the premises which sells both food and drink.

The hall and café are within walking distance to and from the site, where new access facilities have been implemented from Main Road directly to the building, to allow access for pedestrians and cyclists. This is illustrated in the image below:

Walking and Cycling Facilities

The Tusker Rock pub and post office are also located along Main Road, all of which are within walking distance to the site.

Accordingly, the site is well served by new amenities (i.e. community hall) that comprehensively improves the sustainability of the site / settlement, and in turn, improves the sustainability credentials of the site promotion. It therefore follows that the site represents an acceptable location for residential development, and the site should be looked upon favourably accordingly.

It is also the case, as set out in previous representations, that the site is within a maximum 22-minuted bus journey of the following services and facilities:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre.

As such, key services and facilities can be access by sustainable travel over and above the existing level of provision available in Ogmore By Sea (as discussed above).

Accordingly, the relevant 'red' scorings in the Council's assessment should be updated to reflect the site's suitability and sustainability to accommodate the proposed residential development of the site.

Glamorgan Heritage Coast

Insofar as to the position regarding the site's location within the Glamorgan Heritage Coast, detailed submissions are made not only in the Preferred Strategy representations, but also in Annex 1 of this submission. In short, given the pressing need for such development (particularly affordable housing) to come forward in the Plan period to meet ever-increasing needs, development of this nature should be considered more favourably – not least that, as outlined in this Annex, the site would not extend any further that the existing settlement boundary.

Accordingly, the site would be perceived to form part of the settlement of Ogmore By Sea, and not the wider landscape, and therefore, would not have any detrimental impact on the Heritage Coast in any respect. The scoring should be amended accordingly to reflect this position.

Climate Change

As outlined in previous representations, the development will incorporate climate change measures, such as EV charging points, PV panels, as well as adopting sustainable materials for construction whilst maximising the potential for the dwellings to be energy efficient. Accordingly, the development will be built to high sustainable standards, and therefore, the scoring of the site should be amended as a result.

Summary and Conclusion

It has been evidenced above that there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston;

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period.

The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicated in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan

period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.

Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very

unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

“A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth.”

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the ‘Rectory Field, St Brides Road’ site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

‘Land West of Maendy Road’ has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the ‘Candidate Assessment at Preferred Strategy Stage’ (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the “soundness” of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is “sound” (i.e. its allocation is considered to be “unsound”).

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of ‘Land to north and west of Westwinds Business Park’:

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and

• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale

affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Hazelwood, Ogmore By Sea, the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below.

With reference to the above:

• In terms of public transport, there are two bus stops located approximately 200m (3-minute walk) from the site ('Ogmore By Sea Post Office'), with the '303' providing services between Llantwit Major and Bridgend.

• The site is located 200m (3-minute walk) from the 'Ogmore By Sea Post Office' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

• The site is also located 50m (1-minute walk) from a children's park.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities. This

Furthermore, the settlement of Ogmore By Sea has been ranked higher than Llangan (which the site 'Land to north and west of Westwinds Business Park' is located within) in the VoG Sustainable Settlements Appraisal, and therefore, is considered to constitute a more sustainable location to accommodate residential growth. Most notably, Ogmore By Sea

scores '13' in respect to 'Daily Facilities' whereas Llangan only scores '3', evidencing that residents in Ogmore have much better access to services within the locality as compared to Llangan.

Given the above, 'Land at Hazelwood, Ogmore' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Hazelwood, Ogmore' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help

sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3zt
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3z4
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z6
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3z8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zv
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zc
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zw

7190 Comment

Document Element: HG4 - RURAL AFFORDABLE HOUSING LED SITES
Respondent: H Jones, L Sungur and P John [3741]
Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

Whilst the total 122 dwellings proposed under policy HG4 is a relatively small contribution to the overall figures it provides important spatial distribution of homes across the Vale within the rural area.

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis. Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

The inclusion of the site within the settlement boundary is logical especially when viewed in the context of the linear settlement of Fferm Goch. In addition the site is further suited to development allocation as the northern and southern boundaries are built up and the main road runs along the eastern boundary. A flexible approach is encouraged with regard to the delivery of the dwellings in relation to a variety of factors and policy provisions including the housing needs across the Vale, the limit on numbers of rural affordable led sites in minor rural settlements, viability implications relating to obligations/carbon Zero and sustainability obligations and the potential to extend the allocation if the need for homes requires.

The 3 land owners remain committed to this development and local developers are waiting to deliver the allocation.

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

The test of soundness for a Local Development Plan (LDP) is a critical component of the planning process to ensure that the plan is prepared in accordance with legal and procedural
requirements. It involves demonstrating that the plan is 'sound' based on three tests set out by the Welsh Government in the Development Plans Manual (Edition 3). These tests have therefore been considered in our representation, the tests include:

• Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)
• Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
• Test 3: Will the plan deliver (i.e. is it likely to be effective?)

SP1 – Sustainable Growth Strategy

The promotion of small scale affordable housing led development outside of the SGA, as proposed by SP1 is important as this provides essential affordable and market homes in the rural locations of the Vale as well as the SGA. Their provision is critical in meeting the area's housing needs, particularly affordable dwellings and supporting rural community stability, and ensuring that all parts of the Vale remain a place where people of all incomes are able to live and thrive during the plan period to 2036 and beyond.

The essence of Policy SP1 is supported, however it is well documented that there is a backlog in delivery of affordable homes and the need for affordable housing in the Vale is exacerbated by the high prevalence of single person households plus households comprising couples with no children, The Vale also has one of the highest affordability pressures in Wales. As stated in the 2023 Local Housing Market Assessment (LHMA) for the Vale of Glamorgan , the median house price in the Vale is around 8 times the median household income, well above the affordability threshold of 4.5 to 5 times household income for borrowing purposes. Private rents have also risen sharply in the area, commonly placing them out of reach for many low-to-middle income households. All of the above place further pressure on the need to deliver affordable homes in the locality.

The LHMA identifies a need for 1,075 affordable homes per year over the next 5 years based on principal projections (or 1,114 based on the RLDP projections). As mentioned previously past delivery rates fall significantly short and therefore a backlog is present, however despite the reported backlog the RLDP only proposes 3,070 (205/annum) affordable dwellings over the plan period to 2036. Despite the growth strategy of policy SP1 and allocations made through the RLDP, the figure of proposed affordable dwelling numbers is concerning as it falls significantly short of the demand evidenced within the most recent evidence of LHMA of 2023.

The housing figures quoted in SP1 indicate 7,890 dwellings (including the 3,070 affordable dwellings) to 2036, however these figures overall are inadequate over the plan period when considered against the 2022 WG household projections. The 2022-based household projections provide an indication of the future number of households, and their composition, based on population projections and assumptions about households from recent censuses. The vale of Glamorgan demonstrates an increase of almost 12% in the number of households between mid-2022 and mid-2032; note this is the highest percentage increase by Local authority in Wales and way above the average for Wales as a whole (that stands at around 7% increase). The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both open market, but particularly Affordable) development across the Vale.

Without targeted allocations outside of the SGA, as outlined in Policy SP1, the gap described above will continue to widen, forcing more residents to leave the area and weakening community cohesion.

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the RLDP the supporting text of Policy SP2 states:
'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

sustainable growth. Locating affordable-led developments in areas with existing infrastructure such as primary schools will reduce car dependency, lower carbon emissions, and contribute to the Council's climate change commitments.

Considering the above, the limit on small scale rural affordable housing led developments (RAHLD) to 25 for these settlements is questioned and further flexibility recommended on a case by case basis. It is understood the limit on numbers was imposed due to the existing scale of the settlement in which the RAHLD are located, however those allocations will only likely deliver at 50% affordable and therefore only provide 12.5 (or 13) affordable units as a maximum (note Fferm Goch would provide 11 affordable dwellings on current figures of 22 total dwellings). Given the concerns raised in response to Policy SP1 there remains an issue of whether the numbers proposed in the RLDP can meet the demonstrable need for affordable homes and if there is scope on a RAHLD to sensitively increase unit numbers without any material harm then the policy should be flexible to accommodate this.

Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the range of facilities and services provided in these settlements. It is also supported that these settlements are able to provide affordable led residential development of up to 50 dwellings (delivering 25 affordable units). However the provision of an increased number of units in the Primary Non SGA settlements must not be at the expense of a wider number of smaller rural sites with the ability to sustain smaller communities across the Vale, especially given the shortfall in numbers as outlined above.

PGD2 – Residential Development Densities

The best use of finite land is set out in PPW and consistent with the setting of the densities as prescribed in policy PGD2. The policy is considered to meet the 3 tests of soundness.

The approach of policy PGD2 is also supported through the proposed density of the site North of Westwinds business park, Fferm Goch in HG4 (4). This allocation that proposes to provide a density of just over 30/ha within Fferm Goch, a minor rural settlement.

SP6 – Housing Requirement

Affordable housing forms an important part of the housing requirement figures of Policy SP6. Whilst the total 122 dwellings proposed under policy HG4 is a relatively small contribution to the overall figures it provides important spatial distribution of homes across the Vale within the rural area.

Given the concerns raised with regard to Policy SP1 there is fear that the affordable housing numbers will not be sufficient to meet need. The site north of Westwinds business park, Fferm Goch has the ability to expand to the south (as per the CS Ref 398) in order to accommodate additional dwellings (both market and affordable dwellings in order to sustain the viability of the site).

SP7 – Affordable Housing Provision

In accordance with Policy SP7 the allocated site HG4(4) at Fferm Goch provides a range of tenures, types and sizes in response to the LHMA, waiting list data and Older persons housing strategy in order to provide for 11 dwelling units and contributing toward the 3,070 affordable requirement to 2036. Changes in the household composition mean more single person and small homes are required, plus older person accommodation for those wishing to downsize and stay in the area.

Please see comments for Policy SP1 / Policy SP2 above regards concern over the proposed housing numbers and supply of affordable homes against demand - this therefore brings the Deliverability of the plan in to question (Test of Soundness 3).

SP8 – Affordable Housing Requirements

Policy SP8 is supported in so far as contributing much needed affordable housing development commensurate with the size of the settlement in which it sits. We are encourage to see reference to the provision of affordable housing to be negotiated on a site by site basis considering evidenced viability fo the development.

The affordable dwellings proposed foster stability in rural areas by allowing a range of households (from single person to growing families) to stay in their local area.

Policy SP8 states 40% affordable for those developments in primary and minor settlements outside of the SGA yet 50% requirement on affordable housing led allocations in minor rural settlements (also outside of the SGA). This appears inconsistent and penalising those smaller rural sites that will already be more delicately balanced in viability terms by virtue of their limited size of 25 units. Further viability issues covered in other policies (such as SP20, relating to biodiversity, Net Zero and sustainability credentials must (with the required evidence submitted and assessed by the council as stated in Policy SP8) be flexibly reviewed to ensure sites are viable and deliverable as recognised by the Council, there is a danger the stringent requirements, especially for smaller sites, could render those sites unviable in the current climate with rising build costs.

HG4 – Rural affordable housing led sites

The allocation of land north of West Winds Business Park under policy HG4(4) for rural affordable housing led development of 22 units is strongly supported. Then allocation will assist in delivering homes in the rural Vale and contribute to the important stability to the settlement of Fferm Goch to 2036.

The extension of the settlement limit including the site north of West Winds Business Park is supported. The site provides an obvious infill to the small break in the built up area to both the north and south of the site, with the main road running to the eastern boundary of the site.

The inclusion of the site within the settlement of Fferm Goch is logical and in harmony with the existing linear settlement.

The proposal supports the aims of the Local Development Plan and the Welsh Government's commitment to increasing affordable housing supply. By providing for affordable led allocations the policy aligns with the Well-being of Future Generations (Wales) Act 2015 in aiming to promote a healthier, more equal, and cohesive community.

There is concern however surrounding the number of dwellings proposed and if the Plan seeks sufficient dwellings and affordable provision given the predicted need to 2036 shown in the LMHA.

SP13 – Community infrastructure and planning obligations

Policy SP13 demonstrates the importance of community infrastructure in sustaining both the residents well being and economic growth of an area. See also the response to Policy SP2 that refers to the allocation of housing in the rural areas specifically supporting those settlements with local primary school provision.

The viability of developments however must not be compromised in order to ensure delivery of the plan. To see in Policy SP13 that 'development viability' is recognised as a key factor in delivering community infrastructure under planning obligations, is supported. It is recommended that this recognition is replicated in other policies of the LDP in order that the third Test of soundness can be fully met; Deliverability – ensuring the plan is likely to be effective). See comments in relation to Policies SP8/CC1/SP16/CI1.

CI1 – Open Space Provision

Provision of open space in residential developments is supported. HG4(4) promotes open space within the draft allocation.

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

The provisions of SP16 are generally supported as practical measures to ensure important sustainable development is achieved.

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

Provision of Green Infrastructure in residential, and all developments is supported.

HG4(4) retains and enhances existing and will promote green infrastructure on the draft allocation.

The viability of developments however must not be compromised through green infrastructure provision - in order to ensure delivery of the plan. The 'development viability' should therefore be recognised as a key factor in delivering Green Infrastructure. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

Fferm Goch is one of the settlements that remains fully within and covered by the Upper and Lower Thaw Valley Special Landscape Area (SLA). It is noted that in such settlements, while there have been amendments to the identified settlement boundary (inclusion of HG4 (4) rural affordable led housing allocation) this has not affected the SLA designation in these areas. (Background Paper 45; Paragraph 1.16 refers).

The location of the small allocated site HG4(4) is nestled within the settlement of Fferm Goch. It is built up on both the northern and southern boundaries, with the main road running along the eastern boundary. There is no unacceptable harm to the SLA of the Upper and Lower Thaw valley.

The allocation of the site for residential development does not give rise to unacceptable harm to the special qualities and characteristics of the SLA, based on LANDMAP information, continues to be preserved.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

4399 Object

Document Element: HG5 - AFFORDABLE HOUSING EXCEPTION SITES
Respondent: Mr Iestyn Jones [1624]

Summary:

100% affordable housing is government funded where site abnormal costs can be accommodated and fall outside of the normal development appraisal. As such, affordable housing schemes are more than private housing on more difficult and costly to develop brown field and contaminated sites / land. The authority's approach to allocation within private housing developments should also ensure the need is met and therefore negate the requirement to need to develop outside of settlement at all, thus preserving the natural environment and ecology.

Full text:

100% affordable housing is government funded where site abnormal costs can be accommodated and fall outside of the normal development appraisal. As such, affordable housing schemes are more than private housing on more difficult and costly to develop brown field and contaminated sites / land. The authority's approach to allocation within private housing developments should also ensure the need is met and therefore negate the requirement to need to develop outside of settlement at all, thus preserving the natural environment and ecology,

Change suggested by respondent:

As above, ensure affordable housing is delivered as part of the wider private and rented social housing allocations, preserve green open countryside, ecology and space between towns to prevent urban sprawl.

Sound: No
Attachments: None

4800 Comment

Document Element: HG5 - AFFORDABLE HOUSING EXCEPTION SITES
Respondent: Cwmpas [1874]
Agent: Cwmpas

Summary:

Paragraph 6.141 – positive comment and response within the context of Exceptions Policy HG5.

it is considered that the direct reference to community led affordable housing in the Deposit Plan document addresses and removes some of the potential barriers and challenges faced in the delivery of such forms of housing in terms of the availability of sites, enhancing evidence bases of housing need through genuine community level assessment and survey to supplement wider LHMAs and, standards within community led housing schemes around design, density, energy and sustainable transport most closely reflect placemaking principles. In addition, explicit reference to community led housing bridges the knowledge gap around models and management of such housing when compared to other more traditional forms of private and social housing development and thereby recognises the significant role and contribution community led affordable housing makes in addressing pressing and urgent housing needs.

Full text:

Cwmpas is positive in its response to the Deposit RLDP statements and welcomes the reference to community led housing as noted in:

Paragraph 6.121 – positive response though observation and request would be made to minor amendment to wording that after the words 'co-operative housing' the words 'and other forms of community led affordable housing' are inserted as this would accord with the context of PPW Edition 12 as noted.

Paragraph 6.141 – positive comment and response within the context of Exceptions Policy HG5. However, a request would be made that as well as reference to community land trusts that wording is supplemented with suggested words of 'and other forms and models of community led affordable housing.'

Furthermore, it is considered that the direct reference to community led affordable housing in the Deposit Plan document addresses and removes some of the potential barriers and challenges faced in the delivery of such forms of housing.

It is now clearly the case that PPW supports community-led housing as a form of affordable housing and that, in the view of Cwmpas, this is material to the considerations of Local Development Plan preparation and from which the Vale of Glamorgan Deposit Plan would benefit.

Going forward, however, Cwmpas, would consider that detailed planning policy development within the Deposit RLDP could make an overt and explicit community led affordable housing development reference and with specific community led housing policies in addition to those subsumed within more generic and general housing policies.

Firstly, the addition of a specific reference to community led housing within Policies HG1, HG2, HG3 akin to that within HG5 would enable to the benefits and reach of community led housing to be expanded into mainstream housing policies and allocations and not only Exceptions Policy.

Secondly, it would be considered as beneficial that the Deposit RLDP policies on community led housing development could include a clear definition of this type of affordable housing.

In summary, it is considered that the direct reference to community led housing in the Deposit Plan document as noted in Paragraphs 6.121 and 6.141 represent very positive inclusion and that it addresses and removes some of the potential barriers and challenges faced in the delivery of such forms of housing by drafting specific community led housing policies at the RLDP Deposit Plan stage. However, as outlined, our comments and observations are such as to suggest that references could be further extended within the Housing policies and still be in accordance with the framework of PPW Edition 12, key to the evolution of these policies.

Change suggested by respondent:

A request would be made that as well as reference to community land trusts that wording is supplemented with suggested words of 'and other forms and models of community led affordable housing.'

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/scd

5126 Support

Document Element: HG5 - AFFORDABLE HOUSING EXCEPTION SITES

Respondent: Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]

Summary:

Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.
Without prejudice to the Minster's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.
National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter

5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.
After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:
Annex 1 – General Conformity with Future Wales
• No significant concerns
Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)
• Spatial Strategy and Primary Settlements
• Housing and Economic Growth Levels – Regional Collaboration
• Maximising Affordable Housing Provision
• Delivery & Implementation – General
• Gypsy and Travellers
• Renewable Energy
• Minerals
• Best and Most Versatile Agricultural Land (BMV)
• Welsh Language

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.
My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.
Yours sincerely,
Neil Hemington
Chief Planner Welsh Government

Annex 1 - Statement of General Conformity
The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).
There is a joint position statement on the relationship between Bridgend, Cardiff and the Vale of Glamorgan (BP20A), which considers population growth, migration patterns, housing completions, employment characteristics, demographics, commuting and transport links between the three adjoining authorities. The Welsh Government supports the principle of this work which demonstrates how change in the Vale of Glamorgan relates and complements growth in adjoining local authorities. This approach illustrates a good mechanism for other local authorities to follow.
Reasons
Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the climate change and biodiversity emergencies, making the best use of resources.
Policy 1 and Policy 33 of Future Wales states that Cardiff, Newport, and the Valleys will be the main focus for growth and investment in the region. The strategic diagram (p163) also identifies the Vale of Glamorgan within the National Growth Area. The Vale of Glamorgan RLDP, specifically BP20A, provides robust evidence on the interrelationship and key issues with adjoining authorities, including their interaction and how they have shaped and influenced the scale/location of growth in the RLDP. This is set out in the three Joint Position Statements (JPSs).
BP45 'Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR), May 2024, provides further evidence on how the scale of growth indicated for the region has shaped the scale of future economic growth within the Vale of Glamorgan. This results in a higher level of employment growth in the Vale of Glamorgan primarily to increase self-containment and reduce out-flows to adjoining urban areas. Two key areas for future economic growth are identified at Cardiff Airport/Bro Tathan Enterprise Zone and Aberthaw Power Station.
The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.
On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):
Policy 1: Where will Wales grow
Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 6: Town Centre First
Policy 10: International Connectivity – Cardiff Airport
Policy 12 Regional Connectivity
Policy 33: National Growth Area – Cardiff, Newport and the Valleys
Policy 36: South-East Metro

Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.
With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.
The Level of Growth - Homes and Jobs
The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).
Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.
BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.
Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.
The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is

balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level of growth proposed in the plan.
We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.
The Welsh Government notes that BP0A identifies small and large windfalls, based on historic trends of 53/yr and 80/yr respectively. Also, the large windfalls are not included in the first two years of the trajectory, as per the DPM. A non-delivery allowance of 5% is identified, which reflects local characteristics in the Vale of Glamorgan. A flexibility allowance of 9.8% has been factored into the provision. The Welsh Government supports this approach, although whilst Appendix 1 contains a housing trajectory, there is no table to mirror that of Table 21, DPM. This should be included in Appendix 1. 6

Jobs: The Council's 10-year dwelling-led growth option results in a requirement for 4,875 new jobs (325 p/a) over the plan period. This broadly aligns with the projected growth for 5,338 (355 p/a) new jobs in the Employment Land Review (BP12) and as set out in Policy SP14.
The level of employment growth proposed (5,338 jobs) over the plan period is below the target in the currently adopted plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.
In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of homes and jobs proposed in the plan, which is in general conformity with Future Wales.
Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.
The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.
Paragraph 6.137 of the plan states:
"Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary."
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?
Affordable Housing Exceptions Sites
Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.
Employment Land
The Council's Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling

182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).

Delivery and Implementation

PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.

The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.

The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have 'rolled over' from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.

The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters. It will be for the Council to justify deliverability supported by robust financial viability.

Gypsy and Travellers

The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are 'immediate' by 2026. WG note that 4 pitches have since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

Policy SP9 identifies a site at Llangan (0.76Ha) to accommodate the 7 pitches needed. It will be for the Council to demonstrate the appropriate site selection assessment process has been followed and that the site complies with requirements in PPW (4.2.35), Circular 005/2018 (paragraph 35) any relevant guidance and the DPM (5.80-5.85) to allocate a deliverable site in the plan period. The views of the relevant statutory bodies must also be agreed with no outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.

Renewable Energy

Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Could the Council provide an update on alternative options for a DHN in Barry?

It is welcome that the Renewable Energy Assessment (REA) has considered BMV policy, specifically for solar PV, and use of the Predictive ALC Map. The assessment has only considered non-BMV land (Subgrade 3b, Grade 4 and 5). The assessment would benefit from referencing the clarification provided in the DCPO letter of 1st March 2022 in respect of solar PV and BMV agricultural land for completeness.

The study identifies that in the Vale of Glamorgan solar development is more suitable than wind energy because of the flight path of aircraft in the south of the County Borough. However, there are some opportunities for wind sites, but these are likely to be small (<10MW) where aviation risks are lower and there is some grid access. Conversely, there are large expanses of land suitable for solar areas (>10MW) to the West of the County Borough, where there is little existing development. The study identifies 20 large-scale solar areas but recognises that grid constraints may impact the ability of sites to come forward.

Solar and wind search areas (where appropriate) below the 10MW Developments of National Significance (DNS) have been identified (Policy CC3). The plan also includes a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW (Policy CC4). Policy CC3 makes reference to adhering to the criteria in Policy CC4. However, would it not be the case that if search areas have been identified in Policy CC3 have they not already met the criteria? If they would not, should they be identified in the first place? Clarity would be beneficial. The Welsh Government supports the approach but seeks clarity on the point raised.

The Welsh Government notes the proposed search areas for wind energy near Morfa Ystrad Owen/Nant Rhydhalog, according to the Peatlands of Wales Evidence Score Map, the search area includes areas of peatland (Evidence Score 4). The site is also a SINC. This raises concerns as to how the inclusion of this search areas meets the policy test in PPW 6.4.15, 1a and 1b (Stepwise) regarding avoidance of irreplaceable peatland habitats and PPW 6.4.34.

Policy CC4 refers to Developments of National Significance (DNS) in 6.344 and 6.346. This should now refer to Strategic Infrastructure Projects (SIP) which replaced DNS.

Minerals

The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in the Vale of Glamorgan. The Welsh Government policy clarification letter (dated 11 November 2021) identifies a surplus of 1.68mt of crushed rock. As there is a surplus of crushed rock reserves and a lack of sand and gravel production in the Vale, no specific allocations are required in the replacement plan. It is unclear whether a

Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region been agreed, or does the latest Position Statement (July 2022) explain how any shortfall will be met across 9

the region, particularly for crushed rock, of which the Vale has a surplus? Clarification would be beneficial.
BMV Agricultural Land
The Welsh Government has engaged with the Council for land quality advice, survey advice and ALC survey validation for candidate sites. The LPA has produced a specific topic paper on BMV policy application. BP23A. The Deposit RLDP allocates 188 hectares of housing land, 5.62 ha is identified as BMV land (under 3% of total housing allocations). The RLDP:
• Has sought to avoid BMV land wherever possible;
• Uses the Predictive ALC Map as a core evidence layer to inform: The spatial strategy;
• Settlement hierarchy decisions; and
• Candidate site assessments.
•
• Directs strategic growth to areas with least BMV land
• Removes or avoids allocations where BMV impacts were significant or unjustified.
• Quantifies total BMV loss and demonstrates it is minimal (5.62ha) and proportionate at plan level.
• Applies a sequential approach through: Preference for brownfield and non-BMV sites;
• Replacement of higher-BMV sites with lower-grade alternatives where possible.
•
• Requires site-specific ALC surveys to verify actual land quality before allocation.
• Demonstrates that allocated BMV land is: Often small, fragmented, or constrained;
• Sometimes previously disturbed or incapable of being farmed differently from surrounding lower-grade land; and
• Necessary to deliver the Plan's housing strategy where reasonable alternatives are unavailable.
•

In conclusion, the Welsh Government consider the Authority has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy, and on that basis no objection is offered.
Green Infrastructure
Policy SP19 should explicitly reference the need for development to be accompanied by a Green Infrastructure Statement.
PPW12 requires decision makers to apply the step wise approach to GI, with enhancement secured at every stage where possible, there is no distinction made between the quality of the GI assets – the qualification in the policy statement that states proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure should be redrafted to remove the quality reference. The need to avoid an impact in the first instance should also be explicitly incorporated into the policy.
Criterion 1 (Policy SP20) should be redrafted – the stepwise approach in PPW 12 6.4.15 1a - does not distinguish between relative ecological value – the avoidance step applies to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.
Welsh Language
There is limited reference to the Welsh language in the plan, either potential adverse impacts arising through development, or mechanisms via a policy framework to support and grow the use of the language. There are references to a number of Welsh-medium schools (3.26) and the increase in the number of people able to speak Welsh according to the 2011 census (3.52) but there is no mention of the authority's Welsh Language Strategy or promoting or cross-referencing to the aims of 10

Cymraeg 2050: A million Welsh-speakers. Paragraph 6.81 of the plan refers to development north west of Barry:
"Land at North West Barry is allocated for a residential development of up to 376 dwellings and public open space. The site is in a sustainable location on the edge of the Barry, a key settlement, in a location that is well served by services and facilities, including a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium and Church in Wales) and two high schools (English and Welsh Medium) all located in reasonable walking distance. There is an active travel route along Port Road West, bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry. Barry station is 1.3 miles from the site entrance."
There is no mention that the Council want to undertake a Welsh Language Impact Assessment (WLIA) so there appears no attempt to measure the impact on the Welsh schools resulting from housing development? Could the Council clarify if such implications have already been covered in the WLIA for the plan, ISA, or are any specific policies necessary?

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/syf

6330 Object

Document Element: HG5 - AFFORDABLE HOUSING EXCEPTION SITES

Respondent: Penllyn Community Council (Clerk) [243]

Summary:

Provide additional or amended Planning policies [either free standing or within SP3 or HG5] to allow for single unit/micro development, by companies or individuals, of
appropriate, affordable housing units within all communities including 'Hamlets and Smaller Rural Settlements' [in the Countryside] where this is supported by the local community and meets the requirements of SSC1.
These new/amended policy statements [alongside the existing requirements of SSC1 and HG5] could then be applied across all existing settlements and communities currently classified as undefined 'Hamlets and Smaller Rural Settlements' and hence 'Countryside' to allow for controlled appropriate development of affordable homes to meet the aspirations of Para 5.24. and the local Community.

Full text:

-

Change suggested by respondent:

Provide additional or amended Planning policies [either free standing or within SP3 or HG5] to allow for single unit/micro development, by companies or individuals, of
appropriate, affordable housing units within all communities including 'Hamlets and Smaller Rural Settlements' [in the Countryside] where this is supported by the local community and meets the requirements of SSC1. These new/amended policy statements [alongside the existing requirements of SSC1 and HG5] could then be applied across all existing settlements and communities currently classified as undefined 'Hamlets and Smaller Rural Settlements' and hence 'Countryside' to allow for controlled appropriate development of affordable homes to meet the aspirations of Para 5.24. and the local Community.

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/4sh

6647 Object

Document Element: HG5 - AFFORDABLE HOUSING EXCEPTION SITES

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
"There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value".

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.

We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of “areas of high ecological value” will also go some way towards resolving the points we raise.
Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.
Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.
This will ensure that development in the area:
• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of ‘High Ecological Value’ (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording

Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure

Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological
connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to ‘6 broad habitat types’ including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to ‘6 broad ecosystems’ to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP’s Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public

open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will

therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it "is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary".
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW's Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational
Pressure' within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs
clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and

proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

Criterion 6 should be amended to:
"There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value".

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

7050 Object

Document Element: HG5 - AFFORDABLE HOUSING EXCEPTION SITES

Respondent: Marion morgan [2413]

Agent: Geraint John Planning Ltd

Summary:

The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported. However, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.
As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ystradowen area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:
VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it

is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: “There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery.”
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: “Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement.” (Page 66)
Para 5.25 states “Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An ‘affordable housing led’ scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord”.

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

“Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided.”

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision’s clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Ystradowen. The Vale is characteristically ‘rural’, and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the “soundness” of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states “The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities”. The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas

access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months
• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would

be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:
Table 6: Existing LDP allocations to be carried forward

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.
Extract of Housing Trajectory (annotated by GJP - red dotted line)

It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in

general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.
Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.
HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.
Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.
It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise

affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land at Ystradowen (Site ID: 430 / 4060) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) and Annex 2 for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 230 affordable homes in the Cowbridge housing market area / ward - which Ystradowen is located within. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation – see Annex 2.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ystradowen and the proposed site. As outlined within these representations, it is considered that the site (ID 430) represents a sustainable, deliverable and acceptable site. The site is located within 2.7 miles Cowbridge and 2.8 miles of Pontyclun. Due to the availability of frequent bus services, and active travel links, key services are readily available to access for any residents within Ystradowen without the need to travel by car. The site is within a maximum 9- and 14-minute bus journey (respectively) of the following key services:

• Cowbridge and ‘Y Pant’ Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Accordingly, the settlement of Ystradowen represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ystradowen, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a ‘cap’ of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be

amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.
As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 "For the purposes of this policy, 'small-scale' will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."
The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.
SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

Deliverability of the Site

In summary, the site seeks to deliver the following key elements:

• Provision of circa 67 new-build residential dwellings (including 50% affordable housing provision);
• A mix of house-types and tenures across the site to cater for a variety of needs;
• Creation of a new primary access into the site;
• Connection to pedestrian links within the wider area;
• Public open space; and
• Green Infrastructure; and
SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

Land at Ystradowen (Site ID: 4060)

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site. The 'Candidate Sites Assessment Deposit Plan Stage v2' for 'Land at Ystradowen (Site ID: 4060)' sets out that the position of the site at the Deposit Stage is as follows:

"Amendment of proposed use from housing to affordable housing led. Previous site reference 430. The original assessment concluded that whilst the site was adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.
The LDP site in question has subsequently been granted planning permission for housing. This site will serve the future needs of residents in the area and it is not considered that additional land should be allocated in this location."

In terms of the first paragraph, the assessment/conclusion implies and suggests that 'Land at Ystradowen' (4060)' does not adjoin the existing LDP settlement boundary as the allocated site ('Land off Sandy Lane, Ystradowen') has not been built out – "by virtue of an existing adopted plan LDP allocation this is currently under review". Detailed representations have been made and submitted previously at the Housing Trajectory (see Appendix B& C) that outlines that this is fundamentally incorrect. This is not repeated in full here, with just the main points re-iterated.

First and foremost, 'Land at Ystradowen (4060)' directly adjoins the existing LDP settlement boundary. Secondly, there has been a significant change in the position and circumstances. The allocated site ('Land off Sandy Lane, Ystradowen') is currently being "built out", with work commencing on site (see photographic evidence in Appendix C)
- post the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024).
Accordingly, the site no longer adjoins "the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review". Given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.

With regards to the second paragraph, the assessment/conclusion outlines that "The LDP site … will serve the future needs of residents in the area and it is not considered that additional land should be allocated in this location". The arguments and case presented in Appendix B & C. There is a clear overreliance on 'rolled forward' sites / existing allocated sites. A total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%). We believe that a greater level of growth is achievable and should be considered. Not least as there is an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings). As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy. Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply. The "future needs of residents in the area" will therefore not be met/served by just this site, and it is considered that additional land should be allocated in this location.

Furthermore, to reinforce, illustrate, and evidence the point in specific reference to the site the subject to this representation (located in Ystradowen), reference is made to application ref. 2013/00856/OUT – 'Land off Badgers Brook Rise, Ystradowen'. The Final Report of the application states that "Ystradowen is considered a sustainable settlement for further housing development" – i.e. "additional land should be allocated in this location".

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan (see Appendix B), a similar 'scoring' exercise has been undertaken as part evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage can be seen below for reference:
BP18 Candidate Ste Assessment at Preferred Strategy Stage
As demonstrated above, there has been a positive change to the scoring attributed to the site ('Land at Ystradowen').
The change is a positive change to the 'Infrastructure Availability' section changing from: 'Grey' (no score) to 'Amber'.
Infrastructure Availability is outlined as: "Existing or proposed services would be suitable subject to local improvements without impacting on development viability and/or delivery timescales" (see below):
The explanation for the scoring provided by the Vale sets out that "Sites will be assessed against the availability of water connections to the site, in addition to the method of foul sewage disposal from the site. Consultation shall be undertaken with DCWW to determine whether there is sufficient capacity to the wastewater treatments works, and how it links into DCWW's Capital Investment Programme.
Where consultation indicates limited capacity, or the site is located away from a viable connection this may impact on the deliverability/viability of a site should this require significant connection costs or upgrades. Consequently, the

Council shall require site proposers to undertake detailed site viability assessment to determine the impact that additional cost shall have on development cost and deliverability timescales."

As set out above, this is a positive change. This is most likely derived from the allocated site ('Land off Sandy Lane, Ystradowen') currently being "built out", with work commencing on site that would facilitate and improve the 'Infrastructure Availability'. This re-iterates the point made previously re the incorrect assessment reached, and the ever changing position of this site – which will only improve given the neighbouring allocated site ('Land off Sandy Lane, Ystradowen') being "built out".

Land West of Maendy Road, Aberthin (Site ID: 2299)

There are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and the site the subject of these representations. It is therefore considered pertinent to assess and compare the suitability of 'Land West of Maendy Road, Aberthin'. Not least as 'Land at Ystradowen (Site ID: 4060)' is for a "small-scale affordable housing led development in a minor rural settlement", within "the ward of Cowbridge".

The site 'Land West of Maendy Road (Site ID: 2299)' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however from our review of the evidence base submitted as part of the Housing Trajectory consultation, there was no assessment and critique of this site at this stage. This raises questions regarding the "soundness" of this site, given it appears this sites acceptability and inclusion was pre-determined.

The site ('Land West of Maendy Road') has since had a detailed assessment and critique published, however concerns still remain regarding the "soundness" of the site which forms part of the intended housing land supply. The 'Stage 2 Detailed Site Assessment' summary undertaken for 'Land West of Maendy Road' has been extracted below:

"The site is proposed for a small-scale affordable housing led development in a minor rural settlement, which would accord in principle with the strategy. Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent.
The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that."

As mentioned previously, there are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)' (the subject of these representations). Firstly 'Land at Ystradowen (Site ID: 4060)' is also for a "small-scale affordable housing led development", that is "in a minor rural settlement" (Ystradowen). Accordingly, it should follow that as 'Land West of Maendy Road, Aberthin (Site ID: 2299)' "would accord in principle with the strategy", 'Land at Ystradowen (Site ID: 4060)' would also "accord in principle with the strategy".

Furthermore, there is no material difference between the following assessment of Aberthin and Ystradowen:

"Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent."

There is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms.

As set out in our representations to the Preferred Strategy, we reviewed the key services in proximity to the site. The following services were identified as part of that review:

• In terms of public transport, there are two bus stops located approximately 0.2 miles (4-minute walk) from the site ('Land West of Maendy Road'), with the 321 providing services between Llantwit Major and Talbot Green;

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin;

• The site is also located 0.2 miles (4-minute walk) from The Farmers Arms Pub and 0.2 miles (4-minute walk) from The Hare and Hounds Inn; and

• The site is located 0.2 miles (5-minute walk) from Aberthin Village Hall.

Given the above, "The settlement (Ystradowen) is also served by public transport".
Furthermore, Ystradowen is located only 2.7 miles from Cowbridge (9-minute bus journey). The "primary and secondary school provision with the wider range of services and facilities in Cowbridge" mentioned in relation to Aberthin are therefore also in close proximity to Ystradowen.

Given the above, any candidate site at 'Land at Ystradowen' (the subject of these representations – Site ID: 430 / 4060) is no less sustainable than the site at Aberthin (Site ID: 2299).

Not least as the following additional key services are located within Ystradowen and therefore in close proximity to the promoted site:

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'; and
• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Furthermore it is important to note that the above scoring criteria is very limiting, and does not take into account the important role and proximity of settlements in a wider context. For example, it does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant) – see Appendix B for full details.

In addition, as set out within the representations made in relation to the House Trajectory (Appendix C), the following extracts have been taken from the Officer's Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:
As set out above, it is important to note that the Final Report of application ref. 2013/00856/OUT states that "Ystradowen is considered a sustainable settlement for further housing development", due to "the sustainable nature of the settlement". Furthermore, the Final Report of app ref. 2023/00948/FUL states:

• "Notwithstanding this, the site is located in close proximity to local services and there is a bus stop located nearby. Whilst the comments relating to the reliance and frequency of the bus services have been considered, there still remains a bus service in the area"; and
• "Firstly, as aforementioned, many neighbouring comments refer to the site as unsustainable and have commented on the suitability of public transport and cycle routes etc. This has been addressed above."

The above clearly evidences that the location has previously been endorsed as, and is currently still found to be, sustainable.

Accordingly, it can be considered therefore that if the proposed allocated site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen (Site ID: 430 / 4060)' is equally suitable to be an Affordable Housing Led Allocation.

The second section/paragraph of the assessment states:

"The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that."
'Land at Ystradowen (Site ID: 4060)' is also located within "the ward of Cowbridge". As per the above and outlined by the Authority, there is "a need for 230 additional affordable units over the next 15 years". It is clear therefore that there is a need for additional affordable units in this ward, and this site would therefore also help to alleviate this need.

This position is a direct contradiction of course of the assessment/conclusion for 'Land at Ystradowen (Site ID: 4060)' which stated "it is not considered that additional land should be allocated in this location". It is clear from the above however that "additional land should be allocated in this location" to satisfy this "need for 230 additional affordable units over the next 15 years" – which 'Land at Ystradowen (Site ID: 4060)' can do. This is not least the case given the detailed arguments, case and representations presented and evidenced previously above and in Appendix B & C.
To briefly reiterate there is a clear overreliance on 'rolled forward' sites / existing allocated sites which has resulted in the unmet need deriving from the existing LDP being still present. A greater level of provision for new allocations should therefore be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply, so these can "make an important contribution in meeting" the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" – which 'Land at Ystradowen (Site ID: 4060)' can do.

As set out within the representations made in relation to the housing trajectory (see Appendix C), a further key consideration to note and one which does differentiate between the relative merits of the 'Land at Maendy Road, Aberthin' and 'Land at Ystradowen' is that the LDP Proposals Map demonstrates that 'Land West of Maendy Road' is within a Special Landscape Area - see below:
Vale of Glamorgan Proposals Map (Land West of Maendy Road outlined in red
Under Policy MG17 'Special Landscape Areas' it is considered that development in SLA could pose an "unacceptable harm to the important landscape of the area". Accordingly, this development and proposed allocation could therefore cause "unacceptable harm to the important landscape of the area".

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any "unacceptable harm to the important landscape of the area".

Vale of Glamorgan Proposals Map (Land at Ystradowen in red)
It is noted that the detailed assessment scores the site 'amber' in respect to Special Landscape Area (refer to / see later section for full details), with the assessment methodology setting out that "the site is located within a Special Landscape Area/The Glamorgan Heritage Coast and the development may result in little or no change in character and little or no significant effect on landscape character and visual amenity."
A detailed assessment of the impact upon the SLA in respect to the development of 'Land West of Maendy Road, Aberthin' should therefore be, and will need to be, undertaken as part of any planning application. If it is found that the site causes "unacceptable harm to the important landscape of the area", this will lead to this proposed allocation being at risk of not being delivered. This will be as a result of its impacts and acceptability at the planning application stage that the landscape and visual impact of development of the site is unacceptable. As such, these proposed affordable units are at a potential considerable risk of being lost and not satisfying the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" – which 'Land at Ystradowen (Site ID: 4060)' can do as it is not located in an SLA.

In addition the draft housing trajectory set out that "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" is not provided for. This is clearly an issue. Given however 'Land at Ystradowen' does not sit within a SLA – and so not pose any potential concern or cause any "unacceptable harm to the important landscape of the area" – the allocation of this site would be more suitable and "safer" - as there would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for, and the need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" would be satisfied.

As mentioned previously, a detailed assessment and critique has now been undertaken of 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part evidence base for the Deposit Plan using the similar 'scoring' exercise. As such, it is again pertinent to consider and respond to the Council's 'scoring' exercise assessment of the site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part of these representations.

The 'Summary of Assessment of New Candidate Sites' table can be seen overleaf for reference:
BP18A Candidate Site Assessment at Deposit Plan Stage
A comparison between the site assessments undertaken for both 'Land West of Maendy Road, Aberthin (Site ID: 2299)' (on the left), and 'Land at Ystradowen (Site ID: 4060)' (on the right) has been undertaken, and can be seen below for reference:

Having undertaken a review of the scoring for both 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)', it is clear that 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)':

• 'Land at Ystradowen (Site ID: 4060)': 17/33 criteria are scored green = 52%

• 'Land West of Maendy Road, Aberthin (Site ID: 2299)': 12/34 criteria are scored green = 36%

It is clear therefore given the above that 'Land at Ystradowen (Site ID: 4060)' is a better site, and should be allocated accordingly.

One key example to note is how the criterion 'Access to Services and Facilities' has been scored. For 'Land at Ystradowen (Site ID: 4060)' this has been scored green, yet for 'Land West of Maendy Road, Aberthin (Site ID: 2299)', this has been scored red. Given this, this corroborates the position outlined previously above that, if the proposed allocated site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen (Site ID: 430 / 4060)' is equally as sustainable – in fact considered more suitable (given its higher scoring in this respect).

Furthermore, we question the "soundness" of the assessment of 'Land West of Maendy Road, Aberthin (Site ID: 2299)', given that 7/34 (21%) of the criteria do not appears to have not been assessed – i.e. 7/34 (21%) of the criteria are scored grey. This raises questions regarding the "soundness" of this site, given it appears this sites acceptability and inclusion was pre-determined.

It is clear therefore that if 'Land West of Maendy Road, Aberthin (Site ID: 2299)' has been deemed acceptable for allocation, yet 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than this site, 'Land at Ystradowen (Site ID: 4060)' should also be deemed acceptable and be allocated. Not least as the site is "proposed for a small-scale affordable housing led development in a minor rural settlement … would accord in principle with the strategy", and "could make an important contribution in meeting "a "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge".

Summary and Conclusion

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Deposit Plan published as part of the consultation.

In terms of SECTION 4, and a response to the Candidate Site Assessment at Deposit Plan Stage, the following key points have been made:

• The Council's 'Stage 2 Detailed Site Assessment' justification for 'Land at Ystradowen (Site ID: 4060)' is fundamentally incorrect;

• Given the material positive similarities between 'Land at Ystradowen (Site ID: 4060)' and 'Land West of Maendy Road, Aberthin (Site ID: 2299)', which has been deemed acceptable and allocated, 'Land at Ystradowen (Site ID: 4060)' should also be deemed acceptable and allocated accordingly;

• 'Land at Ystradowen (Site ID: 4060)' would help to alleviate and satisfy "a need for 230 additional affordable units over the next 15 years" within "the ward of Cowbridge"; and
• 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)', and so should also be deemed acceptable and be allocated;

Ultimately, 'Land at Ystradowen (Site ID: 4060)' is "proposed for a small-scale affordable housing led development in a minor rural settlement", and as such "would accord in principle with the strategy". It would therefore "make an important contribution in meeting" the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge".

We would therefore object the Council's assessment that the site is not considered suitable for development.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Credentials of this site subject to this submission; and
10. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing-led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;

• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the east of Coliwinston, Colwinston.

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicted in the 'Timing and Phasing of Sites' table, given that the delivery

start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.
Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.
The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.
Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.
Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:
Table 6: Existing LDP allocations to be carried forward
The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.
Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision.
Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".
As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision, and as such, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations

Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
Candidate Site Stage 2 Assessment (Site Ref. 404)
The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:
"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clearly evident deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Despite the absence of site-specific assessment criteria, as the RLDP preferred strategy states a key objective guiding site selection is that the Plan will "provide for vital and vibrant rural communities whilst protecting the countryside through the delivery of growth in sustainable locations related to the settlement hierarchy alongside the provision of supporting infrastructure" (Objective 7 'Fostering Diverse Vibrant and Connected Communities'), it is reasonable to assume that the Council considers 'Land West of Maendy Road' to be a 'sustainable' location.

Given this, we have reviewed the key services in proximity to the site. The following services were identified:

• In terms of public transport, there are two bus stops located approximately 0.2 miles (4-minute walk) from the site ('Land West of Maendy Road'), with the 321 providing services between Llantwit Major and Talbot Green.

• The site is also located 0.2 miles (4-minute walk) from The Farmers Arms Pub and 0.2 miles (4-minute walk) from The Hare and Hounds Inn.

• The site is located 0.2 miles (5-minute walk) from Aberthin Village Hall.

Aberthin is in close proximity (1.2 miles/14-minute walk) to the key settlement of Cowbridge - which is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Considering this, there is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms. Given that Ystradowen is located only 2.7 miles from Cowbridge (9- minute bus journey), the candidate site at 'Land at Ystradowen' is no less sustainable than the site at Aberthin. The following key services are within Ystradowen and therefore in close proximity to the promoted site:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin.
• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Accordingly, it can be considered therefore that if the proposed allocated site 'Land West of Maendy Road, Aberthin' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen' is equally suitable to be an Affordable Housing Led Allocation.
Furthermore, to reinforce the above position and to illustrate and evidence the site's sustainability, the following has been taken from the Officer's Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:
Reference is made in the Final Report of app ref. 2013/00856/OUT which states that "Ystradowen is considered a sustainable settlement for further housing development", due to "the sustainable nature of the settlement".

Furthermore, the Final Report of app ref. 2023/00948/FUL states:

• "Notwithstanding this, the site is located in close proximity to local services and there is a bus stop located nearby. Whilst the comments relating to the reliance and frequency of the bus services have been considered, there still remains a bus service in the area."
• "Firstly, as aforementioned, many neighbouring comments refer to the site as unsustainable and have commented on the suitability of public transport and cycle routes etc. This has been addressed above."

The above clearly evidences that the location has previously been endorsed as, and is currently still found to be, sustainable.

A further key consideration to note and one which does differentiate between the relative merits of the 'Land at Maendy Road, Aberthin' and 'Land at Ystradowen' is that the LDP Proposals Map demonstrates that 'Land West of Maendy Road' is within a Special Landscape Area - see overleaf:
Vale of Glamorgan Proposals Map (Land West of Maendy Road outlined in red)
Under Policy MG17 'Special Landscape Areas' it is considered that development in SLA could pose an "unacceptable harm to the important landscape of the area". Accordingly, this development and proposed allocation could therefore cause "unacceptable harm to the important landscape of the area".

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any "unacceptable harm to the important landscape of the area".
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)

This is a significant factor to consider. 'Land West of Maendy Road, Aberthin' causing "unacceptable harm to the important landscape of the area" will lead to this proposed allocation being at risk of not being delivered by virtue of

detailed assessments of its impacts and acceptability at planning application stage holding that the landscape and visual impact of development of the site is unacceptable. As such 25 affordable units will be lost from the proposed affordable 122 units, and ultimately being lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" is not provided for. This is clearly an issue. Given however 'Land at Ystradowen' does not sit within a SLA – and so not pose any potential concern or cause any "unacceptable harm to the important landscape of the area" – the allocation of this site would be more suitable and "safer" - as therefore would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.
Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)
As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:
Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:
In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Ystradowen', the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below. With reference to the above:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green.

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities.

Furthermore, the settlement of Ystradowen has been ranked highly in the VoG Sustainable Settlements Appraisal, scoring a total of 14 points according to the distance to key services and facilities available. This places Ystradowen 26th out of a total of 87 settlements. As a result, this would be deemed a suitable area to accommodate growth.

As stated above the key settlement of Cowbridge is located in close proximity being only 2.7 miles to the south and a 9-minute bus journey. Cowbridge is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Furthermore, it is important to note that the above criteria does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant). These areas comprise for example the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Given the above, 'Land at Ystradowen' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Ystradowen' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.
Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref. 2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.
Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these

submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Credentials of this site subject to this submission

There has been a significant change in the position and circumstances since the promoted site herein was assessed at Candidate Site Stage and the Assessment undertaken. The Stage 2 Assessment of the site concluded the following: 'Whilst adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.' The assessment/conclusion implies that as this site ('Land off Sandy Lane, Ystradowen') has not been built out and is "currently under review", it suggests that 'Land at Ystradowen' (430) does not adjoin the existing LDP settlement boundary. Given recent developments however associated with the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024) and the site being currently being "built out" and work commencing on site, the site no longer adjoins "the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review". Accordingly, and given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.
The following specific photo evidences 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48) is being built out the western boundary of the promoted Site ID 430. This therefore clearly highlights that the site's boundary is representing the existing settlement limit in the existing development plan. Accordingly, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the existing LDP settlement boundary.
Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

Replace 'no more than 10 dwellings' with 'around 10 dwellings'

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gr
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3gt
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g4
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g7
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3g8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gv
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gc

7152 Object

Document Element: HG5 - AFFORDABLE HOUSING EXCEPTION SITES
Respondent: Peter Stone Properties Ltd [1182]
Agent: Geraint John Planning Ltd

Summary:

The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported. However, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.
As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and

3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £800,000 over the last 12 months, there is a clear and established need for new homes in the Bonvilston area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already

sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Bonvilston. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated

with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been

attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites – not least given that 3 of the 4 allocated affordable housing-led sites are located west of Cowbridge.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land South of A48, Bonvilston (Site ID: 435 / 3857) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area (which Bonvilston is located within), and a need for 242 affordable homes in the Wenvoe housing market area. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

Securing further delivery of Affordable Units

As set out above, it can be assumed that the affordable housing-led allocated sites only provide 61no. affordable

dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included

within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to meet the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Bonvilston and the proposed site. As outlined within these representations, it is considered that the site (ID 435 / 3857) represents a sustainable, deliverable and acceptable site. This proposed allocation is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

• Cowbridge Comprehensive School;
• St Nicholas Primary School;
• Cowbridge Health Centre; and
• Cowbridge town centre for various Retail Services.

Accordingly, the settlement of Bonvilston represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Bonvilston, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a ‘cap’ of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a ‘cap’ limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 “For the purposes of this policy, ‘small-scale’ will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites

with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area.”

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

Deliverability of the Site

In summary, the site seeks to deliver the following key elements:

• In summary, the opportunity of the site seeks to deliver:
• Residential development comprising up to 25 dwellings, with at least 50% affordable housing in accordance with Policy SP2,
• Highways infrastructure within the site;
• Upgraded access to the site;
• Strong legible pedestrian and cycle connections throughout the site and with the existing settlement;
• Green Infrastructure; and
• Sustainable Drainage Systems (SuDS).

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land South of the A48, Bonvilston (Site ID: 3857) sets out that the position of the site at the Deposit Stage is as follows:

"Notwithstanding the amendment from a market led to an affordable housing led scheme (original CS 435), the other reasons why the site was previously discounted still remain.

The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area. Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48. The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable. There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing."
Conservation Area
In terms of the assertion that "The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area, this is strongly disputed.

Whilst it is acknowledged that the site lies within the Bonvilston Conservation Area, the conclusion that it would be adversely affected is not considered to be accurate. Firstly, the site as it currently stands, consists of an open field. This does not match the conservation area which is characterised primarily by residential dwellings of varying densities, and as such, it is considered that development of the site with sensitively designed buildings would enhance as opposed to harming its surroundings.

Secondly, the large residential development to the north of the site, 'Land at Sycamore Cross' ref. 2015/00960/FUL encroaches on the Bonvilston Conservation area but was deemed acceptable by the LPA. Although not all of the site is within the Conservation Area, it's encroachment and presence adjoining and surrounding a large proportion of the area is considerable and was deemed acceptable by Officers in 2017. Given this, a development at the Land South of the A48 should be deemed acceptable, as it follows the same principles albeit at a much smaller scale.

Highways
As for the statement that "Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48", this is also strongly disputed.

The site is located immediately adjacent to the adopted highway where it is proposed to upgrade and enhance the existing gated access point. Due to the existing access point, it is not considered that 'major' highway mitigation works would be needed, rather this would be enhanced and improved as part of the proposed development. Furthermore, given the nature of the road, with long views extending in both directions, it is anticipated that appropriate visibility

splays could be achieved to enable safe access and egress. As such, it is considered that the site would achieve appropriate highway access within the need for "major" highway mitigation works.

Agricultural Land Classification
The Detailed Site Assessment also sets out that "The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable." This is strongly disputed.

A review of the Agricultural Land Classification Predictive Map indicates that the site lies primarily within 'Grade 2: Very good quality agricultural land' but no Grade 1 land is present. Further assessment and tests to establish the quality would therefore be undertaken in due course to confirm the quality of the land. However, it is not considered that it would be suitable to farm in any event given the location immediately adjoining existing residential development and the fact that it is within private ownership. Overall, given that the site is relatively small with a gross area of 0.88 hectares, it is not considered that its development would result in a detrimental or significant loss of agricultural land – not least given that site is not capable of beneficial agricultural production due to its limited size.

Housing / Housing Land
Further to the above, it is also set out that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing", however, this is not considered to be entirely accurate.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area and a need for 242 affordable homes in the Wenvoe housing market area. This need has not been met through the allocations of sites within the RLDP, nor has it been met through outstanding commitments.

As outlined in Annex 1, it can be assumed that the affordable housing-led allocated sites will only provide for 61no. affordable dwellings within the Rural Vale, comprising 4no. sites that are expected to deliver approximately 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. Therefore, more sites should be allocated in order to secure the delivery of a higher number of affordable housing units to meet the target.

As set out within Annex 1, it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, however, there is serious concern regarding the deliverability of these sites, which would result in a significant gap in the total affordable housing that is delivered. Therefore, allocating a greater number of affordable housing-led sites would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in the both the overall affordable housing need, and the need for

the St Nicholas & Llancarfan housing market area, being unmet, with demand continuing to outstrip supply.

The LHMA 2023 sets out the existing stock and planned supply of affordable housing over the next 5 years (up until 2028). This assessment found that the housing market area of St Nicholas & Llancarfan has a committed supply of 4no. one beds, 11no. two beds, and 3no. three beds, with 2 no. three beds as expected re-lets. The assessment also identifies a committed supply of 39no. units for intermediate housing.

The LHMA also sets out the existing stock and planned supply for Wenvoe, identifying the committed supply of social rent homes to be 12no. one beds, 11no. two beds, and 5no. three beds, with 7no. one beds and 8no. two beds as expected re-lets. There is no committed supply for intermediate housing in Wenvoe.

It should be noted that the development of 'Land East of Nicholas' (Campbell Court and Cae Newydd), has now been completed, and as such, can not form part of the housing land available. The latest Pre-Application Response for the site subject to these representations (Land South of the A48, Bonvilston) accounted for the development of the site in

St Nicholas, stating that "even after the developments at St Nicholas and Culverhouse Cross, there was the need in the Wenvoe ward for 1 Bed 71, 2 Bed 49, 3 Bed 29, 4 Bed 7, 5 Bed 5, Total 161".

It should also be noted that there are existing commitments within the Bonvilston area ('Land to the east of Bonvilston'), however, the deliverability of the existing commitment is seriously questioned. Application Ref. 2015/00960/FUL was approved in July 2017, with the Housing Land Supply and Housing Trajectory Report (December 2025) confirming that of the total 120 units permitted, only 40 had completed by 1st April 2025, with the remaining 80 units not started by this same date. Of the 80 units not started, 25 units are affordable homes.

It is well known that phase 1 of the development at 'Land to the east of Bonvilston' has faced difficulties which has led to the development remaining incomplete. This does of course put into question the overall deliverability of the site, and raises concerns about the units that were, and still are, required within the Bonvilston area.

The allocation of the site promoted herein would not only help in the short term in meeting the overall affordable housing target for the Plan, but would also assist in meeting the unmet needs of affordable housing within Bonvilston – not least given the serious concern regarding the deliverability of the committed supply of housing within the St Nicholas & Llancarfan housing market area.

For the reasons set out above, and in light of the information provided within the LHMA 2023 and the Housing Land Supply and Housing Trajectory Report (December 2025), it is evident that there is considerable need for affordable housing within Bonvilston, and accordingly, the housing market areas of St Nicholas & Llancarfan, and Wenvoe. There have not been any sites allocated to assist within meeting the local need, and more sites should be allocated in order to secure delivery of a higher number of affordable housing units to meet the overall target of the Plan.

The contention that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing" is therefore strongly disputed – not least given that there is a clear and evident need to allocate more affordable housing-led sites in order to meet the target set out in the Plan.

Interim Summary

In summary, it is considered that the site subject to these representations would not have an adverse impact on the character and setting of the Bonvilston Conservation Area, nor would major highway mitigation works be required to enable safe vehicular access on to the A48. Moreover, it is considered that the site's classification as BMV Agricultural Land does not pose a fundamental constraint to development – as the site represents a relatively small parcel with a gross area of 0.88 hectares, which is not capable of beneficial agricultural production due to its limited size.

There is also a considerable need for the affordable housing in Bonvilston and the housing market area of St Nicholas & Llancarfan. The site promoted herein would assist in meeting these local needs and should be allocated accordingly.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage

As demonstrated above, there has only been one change to the scoring attributed to the site, this being a change from 'red' to 'amber' for 'Developer Interest'. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with these representations accordingly (see Appendix B).

Whilst detailed submissions were made on the previous assessment, it is considered pertinent for the scoring of the key criteria's to be addressed as part of these representations. As such, these have also been discussed below.
Developer Interest

As set out above, the Detailed Site Assessment for 'Developer Interest' has changed from 'red' to 'amber'. The assessment methodology for this section of the assessment has been extracted below for reference.

As set out above, 'amber' refers to there being no development interest identified at this stage, however, there is evidence to indicate that the site is being actively promoted by the owners.

The representations made to the Preferred Strategy (Appendix B) sets out that whilst the site does not yet have an agreement with a developer to take on the land, it is considered that this would be achieved should the site be allocated, and planning permission granted. Newydd Housing association have been engaged previously and had agreed to take the site forward as a 100% affordable scheme, albeit is also considered that they could take on the affordable units as part of a mixed tenure scheme.

In addition to Newydd, the site promoter has also received an offer from a private social housing provider who would be prepared to support the site as a mixed tenure scheme.

This position has not changed since the Preferred Strategy stage, and is considered that there is continued developer interest for the site. This is not considered to change at any point – not least given the discussions held between the owners of the site in questions and developers of interest.

Environmental and Physical Constraints

As set out at the Pre-Application Stage. the site underwent a Preliminary Ecological Appraisal in September 2022 which identified that whilst some precautionary measures were recommended in terms of protecting priority habitats and reptiles, the site is not fundamentally constrained from development on ecological terms. Given this, it is considered that further ecological surveys would be undertaken at the planning stage to inform any development proposals and ensure the safeguarding of the natural environment.

Access to Key Services (Retail, Primary Schools, and Health Services) and to Services and Facilities

As set out within the representations made to the Preferred Strategy, the site is located within a maximum of a 20-minute bus journey to a version of every key service listed, due to the proximity of the site to settlements such as Cowbridge, Culverhouse Cross and St Nicholas. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Bonvilston without the need to travel by car.

To reiterate, the site 'Land South of the A48, Bonvilston' is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Concluding this allocation as 'unsustainable' in regard to 'availability of local facilities in and around settlements' is not accurate. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

• Cowbridge Comprehensive School;
• St Nicholas Primary School;
• Cowbridge Health Centre; and
• Cowbridge town centre for various Retail Services.

It should also be noted that Bonvilston contains a number of facilities within a short and level walking distance of the site, including the village shop and Café, as well as the Red Lion Public House.

Given the accessibility of the site to other settlements, and the fact that these are made accessible by bus and active travel routes, it is considered that the site should be concluded as sustainable in regard to access to key services.

Summary and Conclusion

As evidenced above, and within the representations made to the Preferred Strategy (Appendix B), there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location, and site, are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory

published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston.

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in

processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicated in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why

completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan

period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.

Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very

unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

“A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth.”

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the ‘Rectory Field, St Brides Road’ site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

‘Land West of Maendy Road’ has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the ‘Candidate Assessment at Preferred Strategy Stage’ (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the “soundness” of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is “sound” (i.e. its allocation is considered to be “unsound”).

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of ‘Land to north and west of Westwinds Business Park’:

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above the site was not considered suitable for further consideration with the site scoring negatively (red) in a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in ‘Sustainable Transport – Public Transport’, this shows the site is not served by public

transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states “New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes”. Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states “new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport.”

It is well known residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need “To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy”. To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to “Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure”. In addition, Promoting Active and Sustainable Travel Choices outlines to “Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel”.

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory “there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities”. There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A “small scale

affordable housing led development” which is needed to “respond to local affordable needs and help sustain services and facilities within these rural communities” will therefore not be provided for. This is clearly an issue.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above the site was rejected and considered not suitable for further consideration. In fact, and unlike ‘Land at Heol Fain, Wick’ and ‘Land to north and west of Westwinds Business Park’ it was stated that this site “could not be considered as a suitable affordable housing led development site”. Despite this, this site has been outlined as an Affordable Housing Led Allocation. As such, the inclusion of this site is “unsound”.

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Land South of A48, Bonvilston.

Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

Replace 'no more than 10 dwellings' with 'around 10 dwellings'

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3jp
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3kr
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k3
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k6
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kf
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kh
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z5

7171 Object

Document Element: HG5 - AFFORDABLE HOUSING EXCEPTION SITES
Respondent: Wig Fach Property Company Ltd [2373]
Agent: Geraint John Planning Ltd

Summary:

The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported. However, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.
As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ogmore By Sea area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either Key Settlement, Service Centre settlement or Primary Settlements, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Ogmore By Sea. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The

Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this

location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that the should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 124 affordable homes in the St Brides Major local housing market area (which Ogmore is located within). As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

It is questionable whether Wick has the capacity to accommodate 50 new dwellings, given the sustainability and rural nature of the area. As a result, it is suggested that the number of homes allocated in Wick is reduced and that a further allocation in St Brides Major is secured, in order to facilitate supporting the delivery of affordable housing through the housing market area, rather than in one minor rural settlement. The sustainability of Ogmore has been assessed, both by the Council through the Sustainability Appraisal and again, through our assessment of the site.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a

target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4 % of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.

Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability

scoring of Ogmore and the proposed site. As outlined within these representations, it is considered that the site (ID xxx) represents a sustainable, deliverable and acceptable site. The site is within a maximum of a 22- minute bus journey to a every key service listed, due to the proximity of the site to settlements such as Bridgend. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Ogmore By Sea without the need to travel by car. The site is located within 5 miles of Bridgend, and within a maximum 22-minute bus journey of the following services:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre for various Retail Services

Moreover, Ogmore has benefitted from the recent development of the Ogmore By Sea Village Hall, which provides space for community activities and events to take place. The hall also includes a coffee shop (Welsh Coffee Company), which only adds further to the daily services provision available within the settlement. Access to the hall and coffee shop is directly provided for pedestrians from the Main Road, which allows for direct access from the site.

Accordingly, the settlement of Ogmore represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

It is acknowledged that the site also lies within the Glamorgan Heritage Coast and this point is addressed further below.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ogmore By Sea, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a ‘cap’ of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a ‘cap’ limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 “For the purposes of this policy, ‘small-scale’ will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area.”

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

Policy DNP3 – Glamorgan Heritage Coast

Given that the site is located in the Glamorgan Heritage Coast, it is noted that the following policy is of relevance to any future development on the site. Criteria 4 of Policy DNP3 states:

“The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development that accords with National Policy.”
It is also noted that supporting Para 6.422 “In seeking to protect the Glamorgan Heritage Coast, the Council

acknowledges that there are some built up areas within the boundary, including the Minor Rural Settlement of Ogmore. In addition, the Vale of Glamorgan rail line crosses part of the Heritage Coast designation in the location where a new station at St Athan is proposed. Whilst being mindful of the need to protect the special qualities of the Glamorgan Heritage Coast, the Council accepts that development within these areas is appropriate, subject to relevant policies of the Plan"(GJP emphasis).

We would offer general support for this policy, and consider this to provide flexibility which allows for certain forms of development. However, we would suggest that the policy wording should be amended to reflect that 'housing' should be supported in the Glamorgan Heritage Coast, providing that the policy exceptions are met. Therefore, the following amendment is proposed as part of the policy should be changed to include "small scale housing" or something similar. The proposed amendments to Policy DNP3 are outlined below in red:

"The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development, including small-scale housing proposals that accords with National Policy."

Again, this would ensure that suitable housing developments can be delivered in the Plan period, to meet the housing needs of the Vale of Glamorgan – particularly in respect of affordable housing.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to Policy DNP3 – Glamorgan Heritage Coast, given the lack of recognition for the potential for small-scale housing proposals;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land at Hazelwood, Ogmore By Sea (Site ID: 3855) sets out that the position of the site at the Deposit Stage is as follows:

"The original site as ruled out as the development would represent unacceptable intrusion in to the open countryside. Whilst the site has now been identified for an affordable housing led development, the original reason for ruling it out still remains."
In terms of the assertion that "the development would represent an unacceptable intrusion into to the open countryside", this is strongly disputed, in that the development of the site would represent a natural rounding off of the existing settlement boundary. An extract of the site relative to the settlement boundary is provided below, which clearly shows that the development of the site would not extend beyond the existing settlement pattern that exists in Ogmore.

Site Outlined in Red and Settlement Shaded in Blue
As clearly demonstrated in the above mapping, the site would extend no further eastwards than the existing housing area to the south of the site. Equally, the site would not be extending any further north than the existing settlement pattern in Ogmore. This position is further supported by the wider aerial view of the site provided overleaf:

Wider Aerial View of Site Outlined in Red and Settlement Shaded in Blue

In summary, it is considered that the proposed allocation of the site represents a logical rounding off of the existing settlement, as depicted in the mapping provided above – where the site follows the existing envelope of the settlement. The site does not extend any further eastwards than the established built form located immediately to the south; indeed, it sits comfortably within the same development line.

As such, it cannot be considered that the site represents an 'intrusion' into the countryside, as the site would be visually and functionally related to the settlement. It therefore follows that the site would be read as part of the settlement, and not the wider rural landscape.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage
As demonstrated above, there are no changes to the scoring attributed to the site. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with this submission (see Appendix A).

Sustainability

Notwithstanding the above, it is considered that the site represents a more sustainable location than what was previously assessed at Preferred Strategy stage, in light of the Ogmore by Sea Hall development. The Hall acts as a community facility, whereby the space is available for hire by local community groups such as birthday parties, weddings, group meetings, and other such similar uses. Moreover, a café (Welsh Coffee Co) is located within the premises which sells both food and drink.

The hall and café are within walking distance to and from the site, where new access facilities have been implemented from Main Road directly to the building, to allow access for pedestrians and cyclists. This is illustrated in the image below:

Walking and Cycling Facilities

The Tusker Rock pub and post office are also located along Main Road, all of which are within walking distance to the site.

Accordingly, the site is well served by new amenities (i.e. community hall) that comprehensively improves the sustainability of the site / settlement, and in turn, improves the sustainability credentials of the site promotion. It therefore follows that the site represents an acceptable location for residential development, and the site should be

looked upon favourably accordingly.

It is also the case, as set out in previous representations, that the site is within a maximum 22-minuted bus journey of the following services and facilities:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre.

As such, key services and facilities can be access by sustainable travel over and above the existing level of provision available in Ogmore By Sea (as discussed above).

Accordingly, the relevant 'red' scorings in the Council's assessment should be updated to reflect the site's suitability and sustainability to accommodate the proposed residential development of the site.

Glamorgan Heritage Coast

Insofar as to the position regarding the site's location within the Glamorgan Heritage Coast, detailed submissions are made not only in the Preferred Strategy representations, but also in Annex 1 of this submission. In short, given the pressing need for such development (particularly affordable housing) to come forward in the Plan period to meet ever-increasing needs, development of this nature should be considered more favourably – not least that, as outlined in this Annex, the site would not extend any further that the existing settlement boundary.

Accordingly, the site would be perceived to form part of the settlement of Ogmore By Sea, and not the wider landscape, and therefore, would not have any detrimental impact on the Heritage Coast in any respect. The scoring should be amended accordingly to reflect this position.

Climate Change

As outlined in previous representations, the development will incorporate climate change measures, such as EV charging points, PV panels, as well as adopting sustainable materials for construction whilst maximising the potential for the dwellings to be energy efficient. Accordingly, the development will be built to high sustainable standards, and therefore, the scoring of the site should be amended as a result.

Summary and Conclusion

It has been evidenced above that there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:
Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston;

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicated in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan

period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.

Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and

• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst

minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale

affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Hazelwood, Ogmore By Sea, the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below.

With reference to the above:

• In terms of public transport, there are two bus stops located approximately 200m (3-minute walk) from the site ('Ogmore By Sea Post Office'), with the '303' providing services between Llantwit Major and Bridgend.

• The site is located 200m (3-minute walk) from the 'Ogmore By Sea Post Office' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

• The site is also located 50m (1-minute walk) from a children's park.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities. This

Furthermore, the settlement of Ogmore By Sea has been ranked higher than Llangan (which the site 'Land to north and west of Westwinds Business Park' is located within) in the VoG Sustainable Settlements Appraisal, and therefore, is considered to constitute a more sustainable location to accommodate residential growth. Most notably, Ogmore By Sea scores '13' in respect to 'Daily Facilities' whereas Llangan only scores '3', evidencing that residents in Ogmore have much better access to services within the locality as compared to Llangan.

Given the above, 'Land at Hazelwood, Ogmore' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Hazelwood, Ogmore' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help

sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

Replace 'no more than 10 dwellings' with 'around 10 dwellings'

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3zt
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3z4
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z6
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3z8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zv
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zc
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zw

5542 Object

Document Element: HG6 – PROVISION OF SPECIALIST ACCOMMODATION

Respondent: Mrs Barbara Entwistle [2589]

Summary:

More private bungalows need to be built to reflect the ageing population & free up larger houses.

Full text:

More private bungalows need to be built to reflect the ageing population & free up larger houses.

Change suggested by respondent:

Built more bungalows.

Sound: No

Attachments: None

6629 Comment

Document Element: HG6 – PROVISION OF SPECIALIST ACCOMMODATION

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.
We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.
Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.
Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the

exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where "qualifying activities" take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.

Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states 'The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.'
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery.
Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)

identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.
South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with

Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against

Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated,

resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com

South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

6627 Comment

Document Element: HG7 - HOUSES IN MULTIPLE OCCUPATION (HMOs)

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.

We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.

We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.

The replacement development plan outlines its Vision and objectives of the RLDP as follows:

'By 2036':

The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.

Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.

The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.

Objectives:

1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment

Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:

Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.

Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.

Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.

TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.

TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'

Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.

Violence against women and Girls:

Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.

In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.

Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and

socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at: https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where "qualifying activities" take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states 'The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design

solutions, innovative and creative product design coupled with robust manufacturing standards.'
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery. Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)
identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.
South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:

The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at: https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).

• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).

• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.

(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to

reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

4468 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mr richard mann [2799]

Summary:

Allocation of site in Llangan for the purpose of G&T breaches agreement with local community and will be subject to a legal challenge.

Full text:

Allocation of site in Llangan for the purpose of G&T breaches agreement with local community and will be subject to a legal challenge.

Change suggested by respondent:

Site to be removed

Sound: No

Attachments: None

4508 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mrs Joanne Jenkins [2780]

Summary:

In relation to the existing Traveller site, my understanding is that following a court case approximately five years ago, it was agreed that the family currently occupying this site would relocate further up the road to join the rest of their family. At that time, it was also agreed that the original site would be returned to the village of Llangan for use as allotments. This resolution followed considerable effort, distress, and financial contribution from local residents to resolve the matter.

I fully recognise and respect the need for Traveller families to have appropriate and secure places to live. However, I believe that Llangan has been more than accommodating to the existing families over many years, and I am concerned about the cumulative impact of further development on a small rural village with already limited infrastructure.

Full text:

Thank you for your email.

It has since become apparent that the village WhatsApp group was incorrectly informed in suggesting that the land adjacent to Twchwyn Garth was being proposed as a traveller site. I understand that this site has instead been identified for affordable housing. While I appreciate the need for such provision, I would like to raise concerns, as our village already accommodates a significant amount of affordable housing in close proximity, including developments at Timbers Green, Fferm Goch, and Canna (adjacent to the school). I therefore feel that Llangan has already made a substantial contribution in this regard.

In relation to the existing Traveller site (Site 403), my understanding is that following a court case approximately five years ago, it was agreed that the family currently occupying this site would relocate further up the road to join the rest of their family. At that time, it was also agreed that the original site would be returned to the village of Llangan for use as allotments. This resolution followed considerable effort, distress, and financial contribution from local residents to resolve the matter.

I fully recognise and respect the need for Traveller families to have appropriate and secure places to live. However, I believe that Llangan has been more than accommodating to the existing families over many years, and I am concerned about the cumulative impact of further development on a small rural village with already limited infrastructure.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/sgy

4602 Comment

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mr David Barton [2683]

Summary:

Traditional Architecture or best equivalent to give everyone a high quality of life on many grounds outlined.

Full text:

Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.

TA or best equivalent to give everyone a high quality of life on many grounds outlined.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5132 Comment

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]

Summary:

Gypsy and Travellers
The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are 'immediate' by 2026. WG note that 4 pitches have since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

Policy SP9 identifies a site at Llangan (0.76Ha) to accommodate the 7 pitches needed. It will be for the Council to demonstrate the appropriate site selection assessment process has been followed and that the site complies with requirements in PPW (4.2.35), Circular 005/2018 (paragraph 35) any relevant guidance and the DPM (5.80-5.85) to allocate a deliverable site in the plan period. The views of the relevant statutory bodies must also be agreed with no outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.
Without prejudice to the Minster's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.
National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.
After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:
Annex 1 – General Conformity with Future Wales
• No significant concerns
Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)
• Spatial Strategy and Primary Settlements
• Housing and Economic Growth Levels – Regional Collaboration
• Maximising Affordable Housing Provision
• Delivery & Implementation – General
• Gypsy and Travellers
• Renewable Energy

• Minerals
• Best and Most Versatile Agricultural Land (BMV)
• Welsh Language

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.
My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.
Yours sincerely,
Neil Hemington
Chief Planner Welsh Government

Annex 1 - Statement of General Conformity
The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).
There is a joint position statement on the relationship between Bridgend, Cardiff and the Vale of Glamorgan (BP20A), which considers population growth, migration patterns, housing completions, employment characteristics, demographics, commuting and transport links between the three adjoining authorities. The Welsh Government supports the principle of this work which demonstrates how change in the Vale of Glamorgan relates and complements growth in adjoining local authorities. This approach illustrates a good mechanism for other local authorities to follow.
Reasons
Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the climate change and biodiversity emergencies, making the best use of resources.
Policy 1 and Policy 33 of Future Wales states that Cardiff, Newport, and the Valleys will be the main focus for growth and investment in the region. The strategic diagram (p163) also identifies the Vale of Glamorgan within the National Growth Area. The Vale of Glamorgan RLDP, specifically BP20A, provides robust evidence on the interrelationship and key issues with adjoining authorities, including their interaction and how they have shaped and influenced the scale/location of growth in the RLDP. This is set out in the three Joint Position Statements (JPSs).
BP45 'Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR), May 2024, provides further evidence on how the scale of growth indicated for the region has shaped the scale of future economic growth within the Vale of Glamorgan. This results in a higher level of employment growth in the Vale of Glamorgan primarily to increase self-containment and reduce out-flows to adjoining urban areas. Two key areas for future economic growth are identified at Cardiff Airport/Bro Tathan Enterprise Zone and Aberthaw Power Station.
The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.
On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):
Policy 1: Where will Wales grow
Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 6: Town Centre First
Policy 10: International Connectivity – Cardiff Airport
Policy 12 Regional Connectivity
Policy 33: National Growth Area – Cardiff, Newport and the Valleys
Policy 36: South-East Metro
Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.

With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.
The Level of Growth - Homes and Jobs
The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).
Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.
BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.
Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.
The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level of growth proposed in the plan.
We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.
The Welsh Government notes that BP0A identifies small and large windfalls, based on historic trends of 53/yr and 80/yr respectively. Also, the large windfalls are not included in the first two years of the trajectory, as per the DPM. A non-delivery allowance of 5% is identified, which reflects local characteristics in the Vale of Glamorgan. A flexibility allowance of 9.8% has been factored into the provision. The Welsh Government supports this approach, although whilst Appendix 1 contains a housing trajectory, there is no table to mirror that of Table 21, DPM. This should be included in Appendix 1. 6

Jobs: The Council's 10-year dwelling-led growth option results in a requirement for 4,875 new jobs (325 p/a) over the plan period. This broadly aligns with the projected growth for 5,338 (355 p/a) new jobs in the Employment Land Review (BP12) and as set out in Policy SP14.
The level of employment growth proposed (5,338 jobs) over the plan period is below the target in the currently adopted plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.
In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of homes and jobs proposed in the plan, which is in general conformity with Future Wales.
Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.
The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.
Paragraph 6.137 of the plan states:
"Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary."
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?
Affordable Housing Exceptions Sites
Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.
Employment Land
The Council's Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).
Delivery and Implementation
PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.
The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.
The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East

Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have 'rolled over' from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.
The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters. It will be for the Council to justify deliverability supported by robust financial viability.
Gypsy and Travellers
The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are 'immediate' by 2026. WG note that 4 pitches have since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

Policy SP9 identifies a site at Llangan (0.76Ha) to accommodate the 7 pitches needed. It will be for the Council to demonstrate the appropriate site selection assessment process has been followed and that the site complies with requirements in PPW (4.2.35), Circular 005/2018 (paragraph 35) any relevant guidance and the DPM (5.80-5.85) to allocate a deliverable site in the plan period. The views of the relevant statutory bodies must also be agreed with no outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.
Renewable Energy
Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Could the Council provide an update on alternative options for a DHN in Barry?
It is welcome that the Renewable Energy Assessment (REA) has considered BMV policy, specifically for solar PV, and use of the Predictive ALC Map. The assessment has only considered non-BMV land (Subgrade 3b, Grade 4 and 5). The assessment would benefit from referencing the clarification provided in the DCPO letter of 1st March 2022 in respect of solar PV and BMV agricultural land for completeness.
The study identifies that in the Vale of Glamorgan solar development is more suitable than wind energy because of the flight path of aircraft in the south of the County Borough. However, there are some opportunities for wind sites, but these are likely to be small (<10MW) where aviation risks are lower and there is some grid access. Conversely, there are large expanses of land suitable for solar areas (>10MW) to the West of the County Borough, where there is little existing development. The study identifies 20 large-scale solar areas but recognises that grid constraints may impact the ability of sites to come forward.
Solar and wind search areas (where appropriate) below the 10MW Developments of National Significance (DNS) have been identified (Policy CC3). The plan also includes a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW (Policy CC4). Policy CC3 makes reference to adhering to the criteria in Policy CC4. However, would it not be the case that if search areas have been identified in Policy CC3 have they not already met the criteria? If they would not, should they be identified in the first place? Clarity would be beneficial. The Welsh Government supports the approach but seeks clarity on the point raised.
The Welsh Government notes the proposed search areas for wind energy near Morfa Ystrad Owen/Nant Rhydhalog, according to the Peatlands of Wales Evidence Score Map, the search area includes areas of peatland (Evidence Score 4). The site is also a SINC. This raises concerns as to how the inclusion of this search areas meets the policy test in PPW 6.4.15, 1a and 1b (Stepwise) regarding avoidance of irreplaceable peatland habitats and PPW 6.4.34.
Policy CC4 refers to Developments of National Significance (DNS) in 6.344 and 6.346. This should now refer to Strategic Infrastructure Projects (SIP) which replaced DNS.
Minerals
The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in the Vale of Glamorgan. The Welsh Government policy clarification letter (dated 11 November 2021) identifies a surplus of 1.68mt of crushed rock. As there is a surplus of crushed rock reserves and a lack of sand and gravel production in the Vale, no specific allocations are required in the replacement plan. It is unclear whether a Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region been agreed, or does the latest Position Statement (July 2022) explain how any shortfall will be met across 9

the region, particularly for crushed rock, of which the Vale has a surplus? Clarification would be beneficial.
BMV Agricultural Land
The Welsh Government has engaged with the Council for land quality advice, survey advice and ALC survey validation for candidate sites. The LPA has produced a specific topic paper on BMV policy application. BP23A. The Deposit RLDP allocates 188 hectares of housing land, 5.62 ha is identified as BMV land (under 3% of total housing allocations). The RLDP:
• Has sought to avoid BMV land wherever possible;
• Uses the Predictive ALC Map as a core evidence layer to inform: The spatial strategy;
• Settlement hierarchy decisions; and
• Candidate site assessments.
•
• Directs strategic growth to areas with least BMV land
• Removes or avoids allocations where BMV impacts were significant or unjustified.
• Quantifies total BMV loss and demonstrates it is minimal (5.62ha) and proportionate at plan level.

• Applies a sequential approach through: Preference for brownfield and non-BMV sites;
• Replacement of higher-BMV sites with lower-grade alternatives where possible.
•
• Requires site-specific ALC surveys to verify actual land quality before allocation.
• Demonstrates that allocated BMV land is: Often small, fragmented, or constrained;
• Sometimes previously disturbed or incapable of being farmed differently from surrounding lower-grade land; and
• Necessary to deliver the Plan's housing strategy where reasonable alternatives are unavailable.
•

In conclusion, the Welsh Government consider the Authority has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy, and on that basis no objection is offered.
Green Infrastructure
Policy SP19 should explicitly reference the need for development to be accompanied by a Green Infrastructure Statement.
PPW12 requires decision makers to apply the step wise approach to GI, with enhancement secured at every stage where possible, there is no distinction made between the quality of the GI assets – the qualification in the policy statement that states proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure should be redrafted to remove the quality reference. The need to avoid an impact in the first instance should also be explicitly incorporated into the policy.
Criterion 1 (Policy SP20) should be redrafted – the stepwise approach in PPW 12 6.4.15 1a - does not distinguish between relative ecological value – the avoidance step applies to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.
Welsh Language
There is limited reference to the Welsh language in the plan, either potential adverse impacts arising through development, or mechanisms via a policy framework to support and grow the use of the language. There are references to a number of Welsh-medium schools (3.26) and the increase in the number of people able to speak Welsh according to the 2011 census (3.52) but there is no mention of the authority's Welsh Language Strategy or promoting or cross-referencing to the aims of 10

Cymraeg 2050: A million Welsh-speakers. Paragraph 6.81 of the plan refers to development north west of Barry:
"Land at North West Barry is allocated for a residential development of up to 376 dwellings and public open space. The site is in a sustainable location on the edge of the Barry, a key settlement, in a location that is well served by services and facilities, including a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium and Church in Wales) and two high schools (English and Welsh Medium) all located in reasonable walking distance. There is an active travel route along Port Road West, bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry. Barry station is 1.3 miles from the site entrance."
There is no mention that the Council want to undertake a Welsh Language Impact Assessment (WLIA) so there appears no attempt to measure the impact on the Welsh schools resulting from housing development? Could the Council clarify if such implications have already been covered in the WLIA for the plan, ISA, or are any specific policies necessary?

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/syf

5188 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mr David Reed [3156]

Summary:

I regard this site as unsuitable for this proposed use on the following grounds.
A Judicial Review found the original process to be illegal and directed the then South Glamorgan Authority to return it to its previous use (Agricultural land)
It was subsequently (2017) agreed with the VoG that it should be transferred to Llangan Community Council for use as a village amenity site i.e. allotments, exercise area, community orchard etc. This position was reaffirmed in 2022 directly with Marcus Goldsworthy and the Planning Department.
The area has no public transport
Access to the site is via single track lanes with infrequent passing places used frequently by agricultural vehicles. Movement of trailers, Caravans etc is particularly difficult and hazardous and for that reason no hauliers visit the village with articulated vehicles.
The existing cesspit system is faulty and insufficient at present and maintained at considerable expense by VoG. The village pumping station cannot cope with the site being tied into the mains sewage system and would require upgrading.
There are no play areas for local children or outside community space.
There are no health facilities
There are very limited spaces in Llangan School and no safe pedestrian access to the nearest bus stop (1 mile)

Full text:

Objections to SP9 - GYPSY AND TRAVELLER SITE PROVISION / SP9 - DARPARIAETH SAFLEOEDD SIPSIWN A THEITHWYR

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The area has no public transport
Access to the site is via single track lanes with infrequent passing places used frequently by agricultural vehicles. Movement of trailers, Caravans etc is particularly difficult and hazardous and for that reason no hauliers visit the village with articulated vehicles.
The existing cesspit system is faulty and insufficient at present and maintained at considerable expense by VoG. The village pumping station cannot cope with the site being tied into the mains sewage system and would require upgrading.
There are no play areas for local children or outside community space.
There are no health facilities
There are very limited spaces in Llangan School and no safe pedestrian access to the nearest bus stop (1 mile)

Change suggested by respondent:

The VoG will make good on its commitment to return this land to the Llangan Community Council for use as a village green and to be used as allotmeents, green space etc.etc as decided by the local community. It will be protected by codicils from disposal by the LCC for any development.

Sound: No

Attachments: None

5305 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION
Respondent: Mrs Sarah Towler [3223]

Summary:

Llangan Gypsy and Traveller Site.
Site in village is unauthorised. Judicial Review found local authority acted illegally in creating this site which should have been returned to its previous agricultural state and subsequently in 2017 Vale of Glamorgan reached an agreement with Llangan Action Group to return the site to the Community Council.
Any granting of planning permission would have to be considered ultra vires.

Full text:

Llangan Gypsy and Traveller Site.
Site in village is unauthorised. Judicial Review found local authority acted illegally in creating this site which should have been returned to its previous agricultural state and subsequently in 2017 Vale of Glamorgan reached an agreement with Llangan Action Group to return the site to the Community Council.
Any granting of planning permission would have to be considered ultra vires.

Change suggested by respondent:

The site is in an unsustainable location.
The site is in open countryside.
The site has restricted access and is unsafe.
There are no public services and the local school is at capacity.
The site does not promote sustainable access to employment, shopping, education, health, community, leisure and sports facilities.

Sound: No
Attachments: None

5332 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION
Respondent: Mr Peter Harries [3232]

Summary:

I note that the site's previous planning permission was quashed and a binding undertaking requires the land to return to its agricultural state after the family vacates. The proposed expansion conflicts with this undertaking. An agreement with the community to vacate the site was broken without explanation. The site does not meet current criteria due to poor access, drainage, safety concerns, lack of local facilities, and its location outside sustainable transport options. The inspector's report only deemed two pitches appropriate, and the proposed increase risks damaging the local landscape and community relations.

Full text:

The site should not be used for the proposed purpose or for any other purpose by the VOG as a consequence of the following:
The Council (under its previous iteration) previously granted planning permission to itself for use of the site as a gypsy site on 20 December 1994. That decision was subsequently quashed by the High Court in R v South Glamorgan County Council ex parte Harding (1997). Following those proceedings, the Council through its Chief Executive, Mr Foster, entered into a formal undertaking dated 1 May 1996 requiring that once the existing family vacated the site, the Council would restore the land to its original agricultural condition. That undertaking remains binding and has not been discharged. The proposed allocation and expansion of the site appears inconsistent with that undertaking and raises questions as to whether the Council can lawfully promote the site for further development.

July 2017 meeting with the VOG. Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. Had the VOG done so, it would have discharged the obligations it had bound itself to under the undertaking. The VOG have, however, without any explanation, gone back on that agreement without any further discussions with the Community.

In any event, the site does not meet the criteria set in the VOG's own current Gypsy and Traveller Accommodation Assessment ("GTAA") and with reference to Policy MD18 (Gypsy and Traveler Accommodation), including because:

Access to the site is poor. The access lanes is too narrow (2.5m min) and can't be widened due to new houses built at the junction near Llangan Primary School. This could impact emergency vehicle access: the recommended access requirements for emergency vehicles is 3.7m
The alternative route through Llangan village is not suitable for emergency vehicles due to it having a weak bridge.
Extending the proposal to 7 pitches on the site would further restrict the ability of emergency vehicles to manoeuvre around the site.
The fact that access is poor was recognised in the Report on the examination into the Vale of Glamorgan Local

Development Plan 2011 – 2016, prepared by Richard E. Jenkins BA(Hons) MSc MRTPI, as Inspector appointed by the Welsh Ministers, dated 25 May 2017, which also found that drainage at the site was poor. The Report stated, "It is clear that access and drainage works would need to be improved for the site to meet Welsh Goverment guidance."1 These constraints remain relevant when considering the proposed significant expansion of the site.
Site access is "unsafe" having extended walks (in excess of 800m) along unlit land with no public footpath or street lighting.
The local area cannot support an increase from 2 to 7 pitches. The site is not reasonably accessible to day-to-day services, facilities and employment, medical facilities, shops and community facilities (there are no shops, restaurants, pubs/bars in the area) and there is no public transport. Cowbridge, the nearest town, is circa 7.5km from the site which is the nearest settlement providing a range of services. As there is no public transport serving the site and no local facilities within walking distance, the location therefore conflicts with the RLDP objective of reducing the need to travel and promoting sustainable transport.
The size of the site and number of pitches proposed is not appropriate to its location and accommodation needs.

The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.

The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.

Notwithstanding the above, the independent inspector's report concluded the site was only suitable for 2 pitches after reviewing all the evidence. It is not clear what has changed for the VOG to conclude that a 350% increase in the number of pitches is suitable.

Mixing families from the Gypsy and Traveller community. The Welsh Government's approach to Gypsy and Traveller Accommodation Assessments (GTAA)

emphasizes culturally appropriate, safe, and secure accommodation that meets the needs of families, rather than dictating the forced mixing of specific family groups on sites. The guidance was updated in March 2025.

The assessment makes no reference that the site is in a Special Landscape Area. The Replacement Local Development Plan 2021 – 2036: Special Landscape Area – Background Paper – BP-28, November 2025, provides at para 1.6:

"The designation of the SLA was not intended to prevent development, but to ensure that where development was acceptable, careful consideration was given to the design elements of the proposal such as the siting, orientation, layout and landscaping, to ensure that the special qualities and characteristics for which the SLAs have been designated are protected."

In addition to being in a designated Special Landscape Area and the site is adjacent to the Llangan Conservation Area. The RLDP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion to seven pitches risks materially affecting the rural character and important views from the conservation area.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.
The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18

New site grants are available and cost should not be a material planning consideration.

Sound: No
Attachments: None

5335 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION
Respondent: Mr Edward Hunt [2995]

Summary:

I understand that the site's previous planning permission was quashed, and a binding undertaking to restore it to agricultural use remains in force. The VOG's proposal to expand the site to seven pitches conflicts with this undertaking and is inconsistent with the site's poor access, drainage issues, and lack of local facilities and public transport. The expansion would harm the rural character, landscape, and community. The site's designation as a Special Landscape Area and proximity to a conservation area further restrict development. The site was supposed to be allotments and even the 2 current pitches prevent that happening.

Full text:

The site should not be used for the proposed purpose or for any other purpose by the VOG as a consequence of the following:
The Council (under its previous iteration) previously granted planning permission to itself for use of the site as a gypsy site on 20 December 1994. That decision was subsequently quashed by the High Court in R v South Glamorgan County Council ex parte Harding (1997). Following those proceedings, the Council through its Chief Executive, Mr Foster, entered into a formal undertaking dated 1 May 1996 requiring that once the existing family vacated the site, the Council would restore the land to its
original agricultural condition. That undertaking remains binding and has not been discharged. The proposed allocation and expansion of the site appears inconsistent with that undertaking and raises questions as to whether the Council can lawfully promote the site for further development.
July 2017 meeting with the VOG.
Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. Had the VOG done so, it would have discharged the obligations it had bound itself to under the undertaking. The VOG have, however, without any explanation, gone back on that agreement without any further discussions with the Community.

In any event, the site does not meet the criteria set in the VOG's own current Gypsy and Traveller Accommodation Assessment ("GTAA") and with reference to Policy MD18 (Gypsy and Traveler Accommodation), including because:
Access to the site is poor. The access lanes is too narrow (2.5m min) and can't be widened due to new houses built at the junction near Llangan Primary School. This could impact emergency vehicle access: the recommended access requirements for emergency vehicles is 3.7m
The alternative route through Llangan village is not suitable for emergency vehicles due to it having a weak bridge.
Extending the proposal to 7 pitches on the site would further restrict the ability of emergency vehicles to manoeuvre around the site.
The fact that access is poor was recognised in the Report on the examination into the Vale of Glamorgan Local Development Plan 2011 – 2016, prepared by Richard E. Jenkins BA(Hons) MSc MRTPI, as Inspector appointed by the Welsh Ministers, dated 25 May 2017, which also found that drainage at the site was poor. The Report stated, "It is clear that access and drainage works would need to be improved for the site to meet Welsh Goverment guidance."1 These constraints remain relevant when considering the proposed significant expansion of the site.
Site access is "unsafe" having extended walks (in excess of 800m) along unlit land with no public footpath or street lighting.
The local area cannot support an increase from 2 to 7 pitches. The site is not reasonably accessible to day-to-day services, facilities and employment, medical facilities, shops and community facilities (there are no shops, restaurants, pubs/bars in the area) and there is no public transport. Cowbridge, the nearest town, is circa 7.5km from the site which is the nearest settlement providing a range of services. As there is no public transport serving the site and no local facilities within walking distance, the location therefore conflicts with the RLDP objective of reducing the need to travel and promoting sustainable transport.
The size of the site and number of pitches proposed is not appropriate to its location and accommodation needs.
The Cardiff and Vale of Glamorgan Survey and Assessment of Gypsy and Traveller Accommodation – Final Report – August 2008, prepared by the Fordham Research Group Limited made a finding that there was a preference for members of the Gypsy / Traveller community for smaller, family sized sites. The expansion of the site to 7 pitches is wholly contrary to the findings of the report commissioned for the benefit and assistance of the VOG.
The Replacement Local Development Plan 2021 – 2036: Issues, Vision and Objectives June 2023 (Background Paper – BP2) states, at 4.1. that:
"Our Vision for the Vale of Glamorgan is a place:
That is safe, clean, and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity, and wellbeing; and
Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area."
The RLDP objectives are set out at paragraph 5 as follows:
"To sustain and further the development of sustainable communities within the VOG, providing opportunities for living, learning, working and socialising for all."
The location of the site does not support this objective.
""To ensure that development within the VOG makes a positive contribution towards reducing the impact of and mitigating the adverse effects of Climate Change. In respect of mitigating climate change, it is stated this means:
"Encourage development that reduces the need to travel by car and encourage people to participate in active travel and use sustainable transport to reduce emissions and improve air quality.
Ensure that all new development and infrastructure is reliant to future impacts arising from Climate Change, Direct development away from areas prone to flood risk and incorporate water management, biodiversity enhancement and adaptation measures." ""
Development of the site will not contribute towards this objective. In particular, as stated above, the lack of public transport will no doubt result in multiple vehicles being used to transport to and from the site. Such a need could be avoided if the allocation requirement was situated in an area with better public transport / an area close to facilities such as healthcare etc.
Alternatively, the agreement previously reached with the VOG to return the site to the Community Council for use as allotments would have a positive impact in respect of climate change, not least due to the fact that produce would be grown locally. The success of allotments in Treoes has demonstrated the viability of such a programme and the VOG

had previously indicated its support for returning the site to the Community Council for such a purpose.
"To reduce the need to VOG residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport."
As above, the site does not meet this objective due to its distance from facilities such as healthcare, shops etc. and the lack of public transport.
"To protect and enhance the VOG's historic, built, and natural environment."
The proposal would adversely impact the undeveloped rural character of the area.
"To maintain, enhance and promote community facilities and services in the VOG."
The VOG's previous agreement to return the site to the community for use as an allotment is a key illustration of achieving this objective. The proposed extension of the site for 7 pitches does not promote this objective, but wholly detracts from it. Llangan does not any other land to enhance and promote community facilities and services. Further, as the VOG is aware, the Community Council is not seeking funding from the VOG for the maintenance of the site which the VOG agreed to transfer management of to the Community Council.
"To provide the opportunity for people in the VOG to meet their housing needs."
It is accepted the VOG has a lawful duty under section 101(1) of the Housing (Wales) Act 2014 to carry out an assessment of the accommodation needs of Gypsies and Travellers residing in its area. That is not disputed. That fact that the VOG has a legal requirement to meet this legal obligation does not, however, mean that the selection of an unsuitable site is acceptable to 'tick a box' to meet that obligation is acceptable.
The fact that the VOG own the site is not a reason on its own for extending the site from 2 to 7 pitches. Further, the fact that the VOG were, through its predecessors in time, party to a lawful undertaking to clear the site and return it to its previous agricultural status, coupled with the VOG's agreement to transfer the management of the site to the Community Council is evidence of a competing obligation in law for the use of the site.
"To ensure that development within the VOG uses land effectively and efficiently and to promote the sustainable use and management of natural resources."
As above, this objective would not be met by extending the site to accommodate 7 pitches. Further, this is agricultural land in a Special Landscaped Area.
Further:
The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.
The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
Notwithstanding the above, the independent inspector's report concluded the site was only suitable for 2 pitches after reviewing all the evidence. It is not clear what has changed for the VOG to conclude that a 350% increase in the number of pitches is suitable.
Mixing families from the Gypsy and Traveller community. The Welsh Government's approach to Gypsy and Traveller Accommodation Assessments (GTAA)
emphasizes culturally appropriate, safe, and secure accommodation that meets the needs of families, rather than dictating the forced mixing of specific family groups on sites. The guidance was updated in March 2025.
The assessment makes no reference that the site is in a Special Landscape Area. The Replacement Local Development Plan 2021 – 2036: Special Landscape Area – Background Paper – BP-28, November 2025, provides at para 1.6:
"The designation of the SLA was not intended to prevent development, but to ensure that where development was acceptable, careful consideration was given to the design elements of the proposal such as the siting, orientation, layout and landscaping, to ensure that the special qualities and characteristics for which the SLAs have been designated are protected."
In addition to being in a designated Special Landscape Area and the site is adjacent to the Llangan Conservation Area. The RLDP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion to seven pitches risks materially affecting the rural character and important views from the conservation area.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.

The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18

New site grants are available and cost should not be a material planning consideration.

Sound: No

Attachments: None

5340 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mr Peter Harries [3232]

Summary:

The site does not meet the VOG's current GTAA and Policy MD18 criteria due to poor access, inadequate for emergency vehicles, and unsafe extended walks without lighting or footpaths. Expansion from 2 to 7 pitches is not supported, as it worsens access, drainage, and safety issues. The local area lacks facilities, public transport, and is over 7.5km from services, conflicting with sustainable transport goals. The site's size and proposed pitches are inappropriate, risking community tension, and do not meet social housing standards. The inspector's report concluded only 2 pitches were

Full text:

The site does not meet the criteria set in the VOG's own current Gypsy and Traveller Accommodation Assessment ("GTAA") and with reference to Policy MD18 (Gypsy and Traveler Accommodation), including because:
Access to the site is poor. The access lanes is too narrow (2.5m min) and can't be widened due to new houses built at the junction near Llangan Primary School. This could impact emergency vehicle access: the recommended access requirements for emergency vehicles is 3.7m
The alternative route through Llangan village is not suitable for emergency vehicles due to it having a weak bridge.
Extending the proposal to 7 pitches on the site would further restrict the ability of emergency vehicles to manoeuvre around the site.
The fact that access is poor was recognised in the Report on the examination into the Vale of Glamorgan Local Development Plan 2011 – 2016, prepared by Richard E. Jenkins BA(Hons) MSc MRTPI, as Inspector appointed by the Welsh Ministers, dated 25 May 2017, which also found that drainage at the site was poor. The Report stated, "It is clear that access and drainage works would need to be improved for the site to meet Welsh Goverment guidance."1 These constraints remain relevant when considering the proposed significant expansion of the site.
Site access is "unsafe" having extended walks (in excess of 800m) along unlit land with no public footpath or street lighting.
The local area cannot support an increase from 2 to 7 pitches. The site is not reasonably accessible to day-to-day services, facilities and employment, medical facilities, shops and community facilities (there are no shops, restaurants, pubs/bars in the area) and there is no public transport. Cowbridge, the nearest town, is circa 7.5km from the site which is the nearest settlement providing a range of services. As there is no public transport serving the site and no local facilities within walking distance, the location therefore conflicts with the RLDP objective of reducing the need to travel and promoting sustainable transport.
The size of the site and number of pitches proposed is not appropriate to its location and accommodation needs.
The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.
The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.

Notwithstanding the above, the independent inspector's report concluded the site was only suitable for 2 pitches after reviewing all the evidence. It is not clear what has changed for the VOG to conclude that a 350% increase in the number of pitches is suitable.
Mixing families from the Gypsy and Traveller community. The Welsh Government's approach to Gypsy and Traveller Accommodation Assessments (GTAA) emphasizes culturally appropriate, safe, and secure accommodation that meets the needs of families, rather than dictating the forced mixing of specific family groups on sites. The guidance was updated in March 2025.

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Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.
The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18

Fuirthermore, new site grants are available and cost should not be a material planning consideration.

Sound: No

Attachments: None

5350 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mrs Annie Price [3238]

Summary:

There is an existing formal agreement in place that states the land will be returned to its original agricultural condition once vacated by the current occupiers. Why is this agreement not being honoured?

Access to the site is poor (from all directions) and does meet the requirements for emergency vehicles. There is no public footpath or street lighting. There is no public transport and no facilities within walking distance, so any expansion will lead to more traffic on the already limited lanes. A previous report found that the area was only suitable for two pitches.

Full text:

There is an existing formal agreement in place that states the land will be returned to its original agricultural condition once vacated by the current occupiers. Why is this agreement not being honoured?

Access to the site is poor (from all directions) and does meet the requirements for emergency vehicles. There is no public footpath or street lighting. There is no public transport and no facilities within walking distance, so any expansion will lead to more traffic on the already limited lanes. A previous report found that the area was only suitable for two pitches.

Change suggested by respondent:

The allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.

The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18

Sound: No

Attachments: None

5488 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mrs Janet Reed OBE [3269]

Summary:

In 2017, an agreement was made for the site's vacation and transfer to LCC for community use, but this was breached. The site remains unsuitable, failing to meet VoG's criteria and policies due to inadequate access, being on a floodplain, lacking footpaths, street lighting, public transport, and amenities, with no wastewater infrastructure.(VOG pays for cesspit emptying) It is located in a Special Landscape Area near the Llangan Conservation Area. The size and number of pitches do not comply with social housing standards for gypsy/traveller sites.

Full text:

In 2017 Llangan Action ,Community Council and the site occupier reached an agreement for vacation of the site and transfer to LCC for Community use. The inclusion is a breach of this agreement. Also of the original Judicial review.The site remains unsuitable , does not meet the VoG's own criteria and is counter to much of the policies because - access is inadequate(lane 2.5m wide in places, emergency vehicles require 3.7m): land is on a flood plane:no footpath,no street lighting;no public transport;limited school places, no amenities. No infrastucture to dispose of waste water. VOG pay for cesspit emptying.Site is in a Special Landscape Area and close to Llangan Conservation Area.
Size and number of pitches is inappropriate - doesn't meet social housing standards which apply to gypsy/traveller sites.

Change suggested by respondent:

For the reasons sety out above the allocation of the site at Llangan for Gypsy/Traveller site is not justified and is inconsistent with the councils own policies and renages on the existing agreement made between the Council,Llangan Action and the current site occupier.
It ignores the instructions set out by the judge in the judicial review.

Sound: No

Attachments: None

5508 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mrs Francesca Dixon [3275]

Summary:

Planning permission to use the site to provide Gypsy and Traveller Accommodation was legally rejected in 1997. This ruling remains in force. In 2017 a further agreement to restore the site upon departure of the original family living there was made. The site fails to meet VOG's criteria for Accommodation Assessment. The lane by the site regularly floods, is narrow and in poor condition. Access to the village is constrained by narrow lanes; they flood; there is no streetlighting or footpaths; there is no bus service. There are no facilities or employment opportunities within the village environs.

Full text:

Planning permission to use the site to provide Gypsy and Traveller Accommodation was legally rejected in 1997. This ruling remains in force. In 2017 a further agreement to restore the site upon departure of the original family living there was made. The site fails to meet VOG's criteria for Accommodation Assessment. The lane by the site regularly floods, is narrow and in poor condition. Access to the village is constrained by narrow lanes; they flood; there is no streetlighting or footpaths; there is no bus service. There are no facilities or employment opportunities within the village environs.

Change suggested by respondent:

For the reasons set out above the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified, it does not meet the legal ruling of 1997 and is indeed inconsistent with the Council's (VOG) own policies regarding land use and in particular facilities that must be available to support such sites and those living there The site should be removed from the Replacement Local Development Plan and an alternative identified that better meets VOG's policy criteria.

Sound: No

Attachments: None

5545 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mr John Melville [3289]

Summary:

I believe the site should not be used for the proposed gypsy and traveller pitches because it conflicts with previous legal undertakings, planning policies, and assessments. The site’s access is inadequate, unsafe, and poorly connected to facilities and public transport, contradicting sustainability objectives. Expansion to seven pitches would harm the rural character, natural environment, and landscape designated areas. A prior agreement to return the site to community use as allotments should be honoured. Therefore, I recommend removing the site from the plan and identifying alternative locations that better meet the relevant criteria.

Full text:

The site should not be used for the proposed purpose or for any other purpose by the VOG as a consequence of the following:

• The Council (under its previous iteration) previously granted planning permission to itself for use of the site as a gypsy site on 20 December 1994. That decision was subsequently quashed by the High Court in R v South Glamorgan County Council ex parte Harding (1997). Following those proceedings, the Council through its Chief Executive, Mr Foster, entered into a formal undertaking dated 1 May 1996 requiring that once the existing family vacated the site, the Council would restore the land to its
original agricultural condition. That undertaking remains binding and has not been discharged. The proposed allocation and expansion of the site appears inconsistent with that undertaking and raises questions as to whether the Council can lawfully promote the site for further development.

July 2017 meeting with the VOG.

Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. Had the VOG done so, it would have discharged the obligations it had bound itself to under the undertaking. The VOG have, however, without any explanation, gone back on that agreement without any further discussions with the Community.

In any event, the site does not meet the criteria set in the VOG’s own current Gypsy and Traveller Accommodation Assessment (“GTAA”) and with reference to Policy MD18 (Gypsy and Traveler Accommodation), including because:

• Access to the site is poor. The access lanes is too narrow (2.5m min) and can’t be widened due to new houses built at the junction near Llangan Primary School. This could impact emergency vehicle access: the recommended access requirements for emergency vehicles is 3.7m

• The alternative route through Llangan village is not suitable for emergency vehicles due to it having a weak bridge.

• Extending the proposal to 7 pitches on the site would further restrict the ability of emergency vehicles to manoeuvre around the site.

• The fact that access is poor was recognised in the Report on the examination into the Vale of Glamorgan Local Development Plan 2011 – 2016, prepared by Richard E. Jenkins BA(Hons) MSc MRTPI, as Inspector appointed by the Welsh Ministers, dated 25 May 2017, which also found that drainage at the site was poor. The Report stated, “It is clear that access and drainage works would need to be improved for the site to meet Welsh Goverment guidance.”1 These

constraints remain relevant when considering the proposed significant expansion of the site.
• Site access is “unsafe” having extended walks (in excess of 800m) along unlit land with no public footpath or street lighting.
• The local area cannot support an increase from 2 to 7 pitches. The site is not reasonably accessible to day-to-day services, facilities and employment, medical facilities, shops and community facilities (there are no shops, restaurants, pubs/bars in the area) and there is no public transport. Cowbridge, the nearest town, is circa 7.5km from the site which is the nearest settlement providing a range of services. As there is no public transport serving the site and no local facilities within walking distance, the location therefore conflicts with the RLDP objective of reducing the need to travel and promoting sustainable transport.
• The size of the site and number of pitches proposed is not appropriate to its location and accommodation needs.
• The Cardiff and Vale of Glamorgan Survey and Assessment of Gypsy and Traveller Accommodation – Final Report – August 2008, prepared by the Fordham Research Group Limited made a finding that there was a preference for members of the Gypsy / Traveller community for smaller, family sized sites. The expansion of the site to 7 pitches is wholly contrary to the findings of the report commissioned for the benefit and assistance of the VOG.
• The Replacement Local Development Plan 2021 – 2036: Issues, Vision and Objectives June 2023 (Background Paper – BP2) states, at 4.1. that:
• “Our Vision for the Vale of Glamorgan is a place:
o That is safe, clean, and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity, and wellbeing; and
o Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area.”
• The RLDP objectives are set out at paragraph 5 as follows:
RDLP objective Comment
To sustain and further the development of sustainable communities within the VOG, providing opportunities for living, learning, working and socialising for all.
The location of the site does not support this objective.
To ensure that development within the VOG makes a positive contribution towards reducing the impact of and mitigating the adverse effects of Climate Change. In respect of mitigating climate change, it is stated this means: “Encourage development that reduces the need to travel by car and encourage people to participate in active travel and use sustainable transport to reduce emissions and improve air quality.
Ensure that all new development and infrastructure is reliant to future impacts arising from Climate Change, Direct development away from areas prone to flood risk and incorporate water management, biodiversity enhancement and adaptation measures.”
Development of the site will not contribute towards this objective. In particular, as stated above, the lack of public transport will no doubt result in multiple vehicles being used to transport to and from the site. Such a need could be avoided if the allocation requirement was situated in an area with better public transport / an area close to facilities such as healthcare etc.
Alternatively, the agreement previously reached with the VOG to return the site to the Community Council for use as allotments would have a positive impact in respect of climate change, not least due to the fact that produce would be grown locally. The success of allotments in Treoes has demonstrated the viability of such a programme and the VOG had previously indicated its support for returning the site to the Community Council for such a purpose.
To reduce the need to VOG residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport.
As above, the site does not meet this objective due to its distance from facilities such as healthcare, shops etc. and the lack of public transport.
To protect and enhance the VOG’s historic, built, and natural environment.
The proposal would adversely impact the undeveloped rural character of the area.
To maintain, enhance and promote community facilities and services in the VOG.
The VOG’s previous agreement to return the site to the community for use as an allotment is a key illustration of achieving this objective. The proposed extension of the site for 7 pitches does not promote this objective, but wholly detracts from it. Llangan does not any other land to enhance and promote community facilities and services. Further, as the VOG is aware, the Community Council is not seeking funding from the VOG for the maintenance of the site which the VOG agreed to transfer management of to the Community Council.
To provide the opportunity for people in the VOG to meet their housing needs.
It is accepted the VOG has a lawful duty under section 101(1) of the Housing (Wales) Act 2014 to carry out an assessment of the accommodation needs of Gypsies and Travellers residing in its area. That is not disputed. That fact that the VOG has a legal requirement to meet this legal obligation does not, however, mean that the selection of an unsuitable site is acceptable to ‘tick a box’ to meet that obligation is acceptable.
The fact that the VOG own the site is not a reason on its own for extending the site from 2 to 7 pitches. Further, the fact that the VOG were, through its predecessors in time, party to a lawful undertaking to clear the site and return it to its previous agricultural status, coupled with the VOG’s agreement to transfer the management of the site to the Community Council is evidence of a competing obligation in law for the use of the site.
To ensure that development within the VOG uses land effectively and efficiently and to promote the sustainable use and management of natural resources.
As above, this objective would not be met by extending the site to accommodate 7 pitches. Further, this is agricultural land in a Special Landscaped Area.
Further:
• The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy

and Traveller community.
• The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
• Notwithstanding the above, the independent inspector's report concluded the site was only suitable for 2 pitches after reviewing all the evidence. It is not clear what has changed for the VOG to conclude that a 350% increase in the number of pitches is suitable.
• Mixing families from the Gypsy and Traveller community. The Welsh Government's approach to Gypsy and Traveller Accommodation Assessments (GTAA)
emphasizes culturally appropriate, safe, and secure accommodation that meets the needs of families, rather than dictating the forced mixing of specific family groups on sites. The guidance was updated in March 2025.

The assessment makes no reference that the site is in a Special Landscape Area. The Replacement Local Development Plan 2021 – 2036: Special Landscape Area – Background Paper – BP-28, November 2025, provides at para 1.6:
"The designation of the SLA was not intended to prevent development, but to ensure that where development was acceptable, careful consideration was given to the design elements of the proposal such as the siting, orientation, layout and landscaping, to ensure that the special qualities and characteristics for which the SLAs have been designated are protected."
In addition to being in a designated Special Landscape Area and the site is adjacent to the Llangan Conservation Area. The RLDP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion to seven pitches risks materially affecting the rural character and important views from the conservation area.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.

The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18

New site grants are available and cost should not be a material planning consideration.

Sound: No
Attachments: None

5552 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION
Respondent: Mr David Hammond [1410]

Summary:

I state that the site should not be used for the proposed or any other purpose by VOG due to breaches of agreements made in 2017, previous planning permission issues, and a binding undertaking to restore the land. The site does not meet VOG's own criteria, being poorly accessible, unsafe, and lacking local facilities. It conflicts with policy objectives on sustainability, community, and environment. Expanding the site to seven pitches contradicts legal, planning, and community considerations, especially given its designation within a Special Landscape Area and proximity to conservation areas.

Full text:

The site should not be used for the proposed purpose or for any other purpose by the VOG due to the following reasons:
Breach of contract of the agreement made in the July 2017 meeting between the local community, traveller family and VOG. Llangan Action, Llangan Community Council and the traveller family occupying the site, reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community.
2/ The Council (under its previous iteration) previously granted planning permission to itself for use of the site as a gypsy site on 20 December 1994. That decision was subsequently quashed by the High Court in R v South Glamorgan County Council ex parte Harding (1997). Following those proceedings, the Council through its Chief Executive, Mr Foster, entered into a formal undertaking dated 1 May 1996 requiring that once the existing family vacated the site, the Council would restore the land to its original agricultural condition. That undertaking remains binding and has not been discharged. The proposed allocation and expansion of the site appears inconsistent with that undertaking and raises questions as to whether the Council can lawfully promote the site for further development.

In any event, the site does not meet the criteria set in the VOG's own current Gypsy and Traveller Accommodation Assessment ("GTAA") and with reference to Policy MD18 (Gypsy and Traveler Accommodation), including because:

Access to the site is poor. The access lanes is too narrow (2.5m min) and can't be widened due to new houses built at the junction near Llangan Primary School. This could impact emergency vehicle access: the recommended access requirements for emergency vehicles is 3.7m. The alternative route through Llangan village is not suitable for emergency vehicles due to it having a weak bridge. Extending the proposal to 7 pitches on the site would further restrict the ability of

emergency vehicles to manoeuvre around the site.

The fact that access is poor was recognised in the Report on the examination into the Vale of Glamorgan Local Development Plan 2011 – 2016, prepared by Richard E. Jenkins BA(Hons) MSc MRTPI, as Inspector appointed by the Welsh Ministers, dated 25 May 2017, which also found that drainage at the site was poor. The Report stated, "It is clear that access and drainage works would need to be improved for the site to meet Welsh Goverment guidance."1 These constraints remain relevant when considering the proposed significant expansion of the site.

Site access is "unsafe" having extended walks (in excess of 800m) along unlit land with no public footpath or street lighting.

The local area cannot support an increase from 2 to 7 pitches. The site is not reasonably accessible to day-to-day services, facilities and employment, medical facilities, shops and community facilities (there are no shops, restaurants, pubs/bars in the area) and there is no public transport. Cowbridge, the nearest town, is circa 7.5km from the site which is the nearest settlement providing a range of services. As there is no public transport serving the site and no local facilities within walking distance, the location therefore conflicts with the RLDP objective of reducing the need to travel and promoting sustainable transport.

The size of the site and number of pitches proposed is not appropriate to its location and accommodation needs.

The Cardiff and Vale of Glamorgan Survey and Assessment of Gypsy and Traveller Accommodation – Final Report – August 2008, prepared by the Fordham Research Group Limited made a finding that there was a preference for members of the Gypsy / Traveller community for smaller, family sized sites. The expansion of the site to 7 pitches is wholly contrary to the findings of the report commissioned for the benefit and assistance of the VOG.

The Replacement Local Development Plan 2021 – 2036: Issues, Vision and Objectives June 2023 (Background Paper – BP2) states, at 4.1. that:

"Our Vision for the Vale of Glamorgan is a place:
That is safe, clean, and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity, and wellbeing; and
Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area."
The RLDP objectives are set out at paragraph 5 as follows:
To sustain and further the development of sustainable communities within the VOG, providing opportunities for living, learning, working and socialising for all. The location of the site does not support this objective.
To ensure that development within the VOG makes a positive contribution towards reducing the impact of and mitigating the adverse effects of Climate Change. In respect of mitigating climate change, it is stated this means: Development of the site will not contribute towards this objective. In particular, as stated above, the lack of public transport will no doubt result in multiple vehicles being used to transport to and from the site. Such a need could be avoided if the allocation requirement was situated in an area with better public transport / an area close to facilities such as healthcare etc.

Alternatively, the agreement previously reached with the VOG to return the site to the Community Council for use as allotments would have a positive impact in respect of climate change, not least due to the fact that produce would be grown locally. The success of allotments in Treoes has demonstrated the viability of such a programme and the VOG had previously indicated its support for returning the site to the Community Council for such a purpose.

To reduce the need to VOG residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport.
As above, the site does not meet this objective due to its distance from facilities such as healthcare, shops etc. and the lack of public transport.

To protect and enhance the VOG's historic, built, and natural environment.
The proposal would adversely impact the undeveloped rural character of the area.

To maintain, enhance and promote community facilities and services in the VOG.
The VOG's previous agreement to return the site to the community for use as an allotment is a key illustration of achieving this objective. The proposed extension of the site for 7 pitches does not promote this objective, but wholly detracts from it. Llangan does not any other land to enhance and promote community facilities and services. Further, as the VOG is aware, the Community Council is not seeking funding from the VOG for the maintenance of the site which the VOG agreed to transfer management of to the Community Council.

To provide the opportunity for people in the VOG to meet their housing needs.
It is accepted the VOG has a lawful duty under section 101(1) of the Housing (Wales) Act 2014 to carry out an assessment of the accommodation needs of Gypsies and Travellers residing in its area. That is not disputed. That fact that the VOG has a legal requirement to meet this legal obligation does not, however, mean that the selection of an unsuitable site is acceptable to 'tick a box' to meet that obligation is acceptable.

The fact that the VOG own the site is not a reason on its own for extending the site from 2 to 7 pitches. Further, the fact that the VOG were, through its predecessors in time, party to a lawful undertaking to clear the site and return it to its previous agricultural status, coupled with the VOG's agreement to transfer the management of the site to the Community Council is evidence of a competing obligation in law for the use of the site.

To ensure that development within the VOG uses land effectively and efficiently and to promote the sustainable use and management of natural resources.
As above, this objective would not be met by extending the site to accommodate 7 pitches. Further, this is agricultural land in a Special Landscaped Area.

Also:
The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.

The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.

Notwithstanding the above, the independent inspector's report concluded the site was only suitable for 2 pitches after reviewing all the evidence. It is not clear what has changed for the VOG to conclude that a 350% increase in the number of pitches is suitable.

Mixing families from the Gypsy and Traveller community. The Welsh Government's approach to Gypsy and Traveller Accommodation Assessments (GTAA) emphasizes culturally appropriate, safe, and secure accommodation that meets the needs of families, rather than dictating the forced mixing of specific family groups on sites. The guidance was updated in March 2025.

The assessment makes no reference that the site is in a Special Landscape Area. The Replacement Local Development Plan 2021 – 2036: Special Landscape Area – Background Paper – BP-28, November 2025, provides at para 1.6:

"The designation of the SLA was not intended to prevent development, but to ensure that where development was acceptable, careful consideration was given to the design elements of the proposal such as the siting, orientation, layout and landscaping, to ensure that the special qualities and characteristics for which the SLAs have been designated are protected."

In addition to being in a designated Special Landscape Area and the site is adjacent to the Llangan Conservation Area. The RLDP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion to seven pitches risks materially affecting the rural character and important views from the conservation area.

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land. The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land. The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18

New site grants are available and cost should not be a material planning consideration.

Sound: No
Attachments: None

5566 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION
Respondent: Mr michael davey [3300]

Summary:

I understand that the site cannot be used for the proposed Gypsy and Traveller pitches due to legal undertakings, poor access, and drainage issues, as well as its location being unsuitable for sustainable living. The site's expansion from two to seven pitches conflicts with planning policies, community agreements, and environmental protections, including its status within a Special Landscape Area. The previous agreement to return the site to community use as allotments remains valid, and the proposed development risks harming local character, increasing tension, and failing to meet the community's needs or sustainable development objectives.

Full text:

The site should not be used for the proposed purpose or for any other purpose by the VOG as a consequence of the following:

The Council (under its previous iteration) previously granted planning permission to itself for use of the site as a gypsy site on 20 December 1994. That decision was subsequently quashed by the High Court in R v South Glamorgan County Council ex parte Harding (1997). Following those proceedings, the Council through its Chief Executive, Mr Foster, entered into a formal undertaking dated 1 May 1996 requiring that once the existing family vacated the site, the Council would restore the land to its
original agricultural condition. That undertaking remains binding and has not been discharged. The proposed allocation and expansion of the site appears inconsistent with that undertaking and raises questions as to whether the Council can lawfully promote the site for further development.

July 2017 meeting with the VOG.
Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. Had the VOG done so, it would have discharged the obligations it had bound itself to under the undertaking. The VOG have, however, without any explanation, gone back on that agreement without any further discussions with the Community.

In any event, the site does not meet the criteria set in the VOG's own current Gypsy and Traveller Accommodation Assessment ("GTAA") and with reference to Policy MD18 (Gypsy and Traveler Accommodation), including because:

Access to the site is poor. The access lanes is too narrow (2.5m min) and can't be widened due to new houses built at the junction near Llangan Primary School. This could impact emergency vehicle access: the recommended access requirements for emergency vehicles is 3.7m

The alternative route through Llangan village is not suitable for emergency vehicles due to it having a weak bridge.

Extending the proposal to 7 pitches on the site would further restrict the ability of emergency vehicles to manoeuvre around the site.

The fact that access is poor was recognised in the Report on the examination into the Vale of Glamorgan Local Development Plan 2011 – 2016, prepared by Richard E. Jenkins BA(Hons) MSc MRTPI, as Inspector appointed by the Welsh Ministers, dated 25 May 2017, which also found that drainage at the site was poor. The Report stated, "It is clear that access and drainage works would need to be improved for the site to meet Welsh Goverment guidance."1 These constraints remain relevant when considering the proposed significant expansion of the site.

Site access is "unsafe" having extended walks (in excess of 800m) along unlit land with no public footpath or street lighting.

The local area cannot support an increase from 2 to 7 pitches. The site is not reasonably accessible to day-to-day services, facilities and employment, medical facilities, shops and community facilities (there are no shops, restaurants, pubs/bars in the area) and there is no public transport. Cowbridge, the nearest town, is circa 7.5km from the site which is the nearest settlement providing a range of services. As there is no public transport serving the site and no local facilities within walking distance, the location therefore conflicts with the RLDP objective of reducing the need to travel and promoting sustainable transport.

The size of the site and number of pitches proposed is not appropriate to its location and accommodation needs.

The Cardiff and Vale of Glamorgan Survey and Assessment of Gypsy and Traveller Accommodation – Final Report – August 2008, prepared by the Fordham Research Group Limited made a finding that there was a preference for members of the Gypsy / Traveller community for smaller, family sized sites. The expansion of the site to 7 pitches is wholly contrary to the findings of the report commissioned for the benefit and assistance of the VOG.

The Replacement Local Development Plan 2021 – 2036: Issues, Vision and Objectives June 2023 (Background Paper – BP2) states, at 4.1. that:

"Our Vision for the Vale of Glamorgan is a place:

That is safe, clean, and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity, and wellbeing; and

Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area."

The RLDP objectives are set out at paragraph 5 as follows:

RDLP objective

Comment

To sustain and further the development of sustainable communities within the VOG, providing opportunities for living, learning, working and socialising for all.

The location of the site does not support this objective.

To ensure that development within the VOG makes a positive contribution towards reducing the impact of and mitigating the adverse effects of Climate Change. In respect of mitigating climate change, it is stated this means:

“Encourage development that reduces the need to travel by car and encourage people to participate in active travel and use sustainable transport to reduce emissions and improve air quality.

Ensure that all new development and infrastructure is reliant to future impacts arising from Climate Change, Direct development away from areas prone to flood risk and incorporate water management, biodiversity enhancement and adaptation measures.”

Development of the site will not contribute towards this objective. In particular, as stated above, the lack of public transport will no doubt result in multiple vehicles being used to transport to and from the site. Such a need could be avoided if the allocation requirement was situated in an area with better public transport / an area close to facilities such as healthcare etc.

Alternatively, the agreement previously reached with the VOG to return the site to the Community Council for use as allotments would have a positive impact in respect of climate change, not least due to the fact that produce would be grown locally. The success of allotments in Treoes has demonstrated the viability of such a programme and the VOG had previously indicated its support for returning the site to the Community Council for such a purpose.

To reduce the need to VOG residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport.

As above, the site does not meet this objective due to its distance from facilities such as healthcare, shops etc. and the lack of public transport.

To protect and enhance the VOG’s historic, built, and natural environment.

The proposal would adversely impact the undeveloped rural character of the area.

To maintain, enhance and promote community facilities and services in the VOG.

The VOG’s previous agreement to return the site to the community for use as an allotment is a key illustration of achieving this objective. The proposed extension of the site for 7 pitches does not promote this objective, but wholly detracts from it. Llangan does not any other land to enhance and promote community facilities and services. Further, as the VOG is aware, the Community Council is not seeking funding from the VOG for the maintenance of the site which the VOG agreed to transfer management of to the Community Council.

To provide the opportunity for people in the VOG to meet their housing needs.

It is accepted the VOG has a lawful duty under section 101(1) of the Housing (Wales) Act 2014 to carry out an assessment of the accommodation needs of Gypsies and Travellers residing in its area. That is not disputed. That fact that the VOG has a legal requirement to meet this legal obligation does not, however, mean that the selection of an unsuitable site is acceptable to ‘tick a box’ to meet that obligation is acceptable.

The fact that the VOG own the site is not a reason on its own for extending the site from 2 to 7 pitches. Further, the fact that the VOG were, through its predecessors in time, party to a lawful undertaking to clear the site and return it to its previous agricultural status, coupled with the VOG’s agreement to transfer the management of the site to the Community Council is evidence of a competing obligation in law for the use of the site.

To ensure that development within the VOG uses land effectively and efficiently and to promote the sustainable use and management of natural resources.

As above, this objective would not be met by extending the site to accommodate 7 pitches. Further, this is agricultural land in a Special Landscaped Area.

Further:

The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.

The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.

Notwithstanding the above, the independent inspector's report concluded the site was only suitable for 2 pitches after reviewing all the evidence. It is not clear what has changed for the VOG to conclude that a 350% increase in the number of pitches is suitable.

Mixing families from the Gypsy and Traveller community. The Welsh Government's approach to Gypsy and Traveller Accommodation Assessments (GTAA) emphasizes culturally appropriate, safe, and secure accommodation that meets the needs of families, rather than dictating the forced mixing of specific family groups on sites. The guidance was updated in March 2025.

The assessment makes no reference that the site is in a Special Landscape Area. The Replacement Local Development Plan 2021 – 2036: Special Landscape Area – Background Paper – BP-28, November 2025, provides at para 1.6:

"The designation of the SLA was not intended to prevent development, but to ensure that where development was acceptable, careful consideration was given to the design elements of the proposal such as the siting, orientation, layout and landscaping, to ensure that the special qualities and characteristics for which the SLAs have been designated are protected."

In addition to being in a designated Special Landscape Area and the site is adjacent to the Llangan Conservation Area. The RLDP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion to seven pitches risks materially affecting the rural character and important views from the conservation area.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.

The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18

New site grants are available and cost should not be a material planning consideration.

Sound: No

Attachments: None

5593 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mr Mathew Daniels [3302]

Summary:

I object because there is a legally binding agreement from 2017 involving the VOG council, Llangan Community Council, and the 'ONE' traveller family, although it is unenforced. The site does not meet VOG guidelines due to poor access, flood risk, inadequate drainage, lack of public footpaths, street lighting, and public transport, making it dangerous. It is located in a special landscape area near a conservation site and contradicts VOG's sustainability objectives by increasing vehicular traffic on poorly maintained rural lanes which hampers access to local facilities and emergency services.

Full text:

I object because there is a legally binding agreement from 2017 involving the VOG council, Llangan Community Council, and the 'ONE' traveller family, although it is unenforced. The site does not meet VOG guidelines due to poor access, flood risk, inadequate drainage, lack of public footpaths, street lighting, and public transport, making it dangerous. It is located in a special landscape area near a conservation site and contradicts VOG's sustainability objectives by increasing vehicular traffic on poorly maintained rural lanes which hampers access to local facilities and emergency services.

Change suggested by respondent:

I don't think this plan is appropriate at all.
This plan should be cancelled and a more appropriate site found elsewhere that is more suitable.
For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.
The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.
New site grants are available and cost should not be a material planning consideration.

Sound: No

Attachments: None

5598 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Dr Ross Chidgey [3291]

Summary:

The use/expansion of this site should be rejected. Planning permission for such use was quashed by the High Court in R v South Glamorgan County Council ex parte Harding(1997), and the Council subsequently gave a binding undertaking in 1996 to restore the land to agricultural use once the existing family vacated. In 2017 the Council agreed the site would transfer to Llangan Community Council for community use but later reversed this without consultation. The site has poor access, inadequate drainage, and unsafe routes, it is unsuitable for expansion to seven pitches due to limited services, transport, and emergency vehicle access

Full text:

Summary:
The Council (under its previous iteration) previously granted planning permission to itself for use of the site as a gypsy site on 20 December 1994. That decision was subsequently quashed by the High Court in R v South Glamorgan County Council ex parte Harding (1997). Following those proceedings, the Council through its Chief Executive, Mr Foster, entered into a formal undertaking dated 1 May 1996 requiring that once the existing family vacated the site, the Council would restore the land to its
original agricultural condition. That undertaking remains binding and has not been discharged. The proposed allocation and expansion of the site appears inconsistent with that undertaking and raises questions as to whether the Council can lawfully promote the site for further development.
July 2017 meeting with the VOG.
Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. Had the VOG done so, it would have discharged the obligations it had bound itself to under the undertaking. The VOG have, however, without any explanation, gone back on that agreement without any further discussions with the Community.

any event, the site does not meet the criteria set in the VOG's own current Gypsy and Traveller Accommodation Assessment ("GTAA") and with reference to Policy MD18 (Gypsy and Traveler Accommodation), including because:

Access to the site is poor. The access lanes is too narrow (2.5m min) and can't be widened due to new houses built at the junction near Llangan Primary School. This could impact emergency vehicle access: the recommended access requirements for emergency vehicles is 3.7m

The alternative route through Llangan village is not suitable for emergency vehicles due to it having a weak bridge.

Extending the proposal to 7 pitches on the site would further restrict the ability of emergency vehicles to manoeuvre around the site.

The fact that access is poor was recognised in the Report on the examination into the Vale of Glamorgan Local Development Plan 2011 – 2016, prepared by Richard E. Jenkins BA(Hons) MSc MRTPI, as Inspector appointed by the Welsh Ministers, dated 25 May 2017, which also found that drainage at the site was poor. The Report stated, "It is clear that access and drainage works would need to be improved for the site to meet Welsh Goverment guidance."1 These constraints remain relevant when considering the proposed significant expansion of the site.

Site access is "unsafe" having extended walks (in excess of 800m) along unlit land with no public footpath or street lighting.

The local area cannot support an increase from 2 to 7 pitches. The site is not reasonably accessible to day-to-day services, facilities and employment, medical facilities, shops and community facilities (there are no shops, restaurants, pubs/bars in the area) and there is no public transport. Cowbridge, the nearest town, is circa 7.5km from the site which is the nearest settlement providing a range of services. As there is no public transport serving the site and no local facilities within walking distance, the location therefore conflicts with the RLDP objective of reducing the need to travel and promoting sustainable transport.

The size of the site and number of pitches proposed is not appropriate to its location and accommodation needs.

The Cardiff and Vale of Glamorgan Survey and Assessment of Gypsy and Traveller Accommodation – Final Report – August 2008, prepared by the Fordham Research Group Limited made a finding that there was a preference for members of the Gypsy / Traveller community for smaller, family sized sites. The expansion of the site to 7 pitches is wholly contrary to the findings of the report commissioned for the benefit and assistance of the VOG.

The Replacement Local Development Plan 2021 – 2036: Issues, Vision and Objectives June 2023 (Background Paper – BP2) states, at 4.1. that:

"Our Vision for the Vale of Glamorgan is a place:

That is safe, clean, and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity, and wellbeing; and Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area." This clearly doesn't fit the vision

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.

The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18

New site grants are available and cost should not be a material planning consideration

Sound: No

Attachments: None

5599 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Dr Ross Chidgey [3291]

Summary:

In June 2017, an agreement was made for the site to be transferred to the Community Council for community use, but the RLDP proposal contradicts this. The site is unsuitable for the proposed gypsy and traveller pitches due to poor access, drainage, lack of public facilities, and its location. It also fails to meet social housing standards and risks community tension. The site's location in a Special Landscape Area and proximity to a conservation area make expansion undesirable. Transferring the site to the Community Council aligns better with VOG's environmental and community objectives.

Full text:

In around June 2017, Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The proposal in the RLDP for the site is wholly contrary to what was agreed.

The site is not suitable for the proposed use and does not meet the VOG's own criteria for a gypsy and traveller site, including because:
o Access is poor, with the lane being only 2.5m wide, which is less than the recommended access requirements for emergency vehicles of 3.7m. Extending the pitches would also restrict the ability of emergency vehicles to turn around on the site.
o The site is situated in low-lying land and has poor drainage.
o There is no public footpath near the site and no street lighting.
o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.
o The size of the site and number of pitches is not appropriate to its location and accommodation needs.
Further:
o The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.
o The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
o The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.
o The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.
o The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
o The proposed development would also be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.
o The fact that the VOG owns the site does not in and of itself make it suitable for the proposed expansion.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.

· The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.

· New site grants are available and cost should not be a material planning consideration.

Sound: No

Attachments: None

5602 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Dr Beverley Evans [3306]

Summary:

I note that an agreement was reached with the VOG for the site's vacating and transfer to the Community Council for community use, but the RLDP proposal contradicts this. The site is unsuitable for the proposed gypsy and traveller use due to poor access, drainage, lack of public transport or amenities, and inappropriate size. It also fails to meet social housing standards and risks community tension. Situated in a protected landscape area, expansion conflicts with environmental, landscape, and local objectives, and the site's ownership does not justify its proposed development.

Full text:

Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The proposal in the RLDP for the site is wholly contrary to what was agreed.

· The site is not suitable for the proposed use and does not meet the VOG's own criteria for a gypsy and traveller site, including because:

o Access is poor, with the lane being only 2.5m wide, which is less than the recommended access requirements for emergency vehicles of 3.7m. Extending the pitches would also restrict the ability of emergency vehicles to turn around on the site.

o The site is situated in low-lying land and has poor drainage.

o There is no public footpath near the site and no street lighting.

o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.

o The size of the site and number of pitches is not appropriate to its location and accommodation needs.

· Further:

o The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.

o The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.

o The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.

o The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.

o The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.

o The proposed development would also be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

o The fact that the VOG owns the site does not in and of itself make it suitable for the proposed expansion.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.

The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18

Sound: No

Attachments: None

5604 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Dr Beverley Evans [3306]

Summary:

In June 2017, an agreement was reached for the site's transfer to the Community Council for community use, but the RLDP proposal contradicts this. The site is unsuitable for the proposed gypsy and traveller use due to poor access, drainage, lack of amenities, and its location in a sensitive landscape area. It does not meet social housing standards, risks community tension, and conflicts with VOG's objectives to protect the environment, reduce travel needs, and promote community facilities. The site's ownership by VOG does not justify its expansion.

Full text:

· In around June 2017, Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The proposal in the RLDP for the site is wholly contrary to what was agreed.
· The site is not suitable for the proposed use and does not meet the VOG's own criteria for a gypsy and traveller site, including because:
o Access is poor, with the lane being only 2.5m wide, which is less than the recommended access requirements for emergency vehicles of 3.7m. Extending the pitches would also restrict the ability of emergency vehicles to turn around on the site.
o The site is situated in low-lying land and has poor drainage.
o There is no public footpath near the site and no street lighting.
o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.
o The size of the site and number of pitches is not appropriate to its location and accommodation needs.
· Further:
o The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.
o The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
o The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.
o The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.
o The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
o The proposed development would also be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.
o The fact that the VOG owns the site does not in and of itself make it suitable for the proposed expansion.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.
The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.
New site grants are available and cost should not be a material planning consideration.

Sound: No

Attachments: None

5605 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mr Mathew Daniels [3302]

Summary:

I believe this proposal, like SP9, is poorly considered and contradicts a lawful agreement made in 2017 between the VOG council, Llangan community council, and the 'ONE' traveller family to transfer the site for community use. Points 1-7 in the proposal are inaccurate. The site's only access is via rural lanes, increasing traffic and risking safety. It does not meet social housing standards, risks community tension, is in a flood risk area with inadequate amenities, and is in a protected landscape area, making the expansion inappropriate.

Full text:

Similarly this proposal, like SP9, is ill thought out and contrary to a previous LAWFULL agreement between the VOG council, LLangan community council and the 'ONE' traveller family to transfer the site in 2017 to the community council for community use.
Points 1-7 outlined in the proposal are not correct.
1,2 & 5. The site only has vehicular access leading to increased traffic on poorly maintained, unlit rural lanes with no public pathways, hampering safe access to local facilities and emergency services. No public transport within a safe walking distance.
3. The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.
4. The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
6. Situated in a Flood risk area with on site services/amenities not being adequate without serious work - who will pay for this work?
7. The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.
Furthermore the nearest settlement with appropriate facilities and services is Cowbridge 7.5 km away.

Change suggested by respondent:

There are no changes that, in my mind would support any such proposal. There are no provisions to restrict the use of this site in the future should this inappropriate proposal be passed; furthermore the VOG Council has shown that they can agree to certain lawful proposals only to renege on them in future years. Therefore this proposal should be removed from the development plan.

Sound: No

Attachments: None

5625 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Ms An Silk [3259]

Summary:

Access to local amenities from the site is poor. There is no public transport or safe (walking) route to Cowbridge / Pencoed, therefore journeys will need to be by car. The road is narrow and access for emergency services would be difficult.
The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
Furthermore, the independent inspector's report concluded the site was only suitable for 2 pitches after reviewing all the evidence.

Full text:

Access to local amenities from the site is poor. There is no public transport or safe (walking) route to Cowbridge / Pencoed, therefore journeys will need to be by car. The road is narrow and access for emergency services would be difficult.
The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
Furthermore, the independent inspector's report concluded the site was only suitable for 2 pitches after reviewing all the evidence.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.

Sound: No

Attachments: None

5626 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Ms An Silk [3259]

Summary:

Access to the site is poor and there are very limited facilities within a 3mile radius. Vehicular access is particularly restricted. The scale of the proposal is not proportionate to the scale of the site.
The site is in a Special Landscape Area whereas the RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.
The site would not meet the standards required for social housing.

Full text:

Access to the site is poor and there are very limited facilities within a 3mile radius. Vehicular access is particularly restricted. The scale of the proposal is not proportionate to the scale of the site.
The site is in a Special Landscape Area whereas the RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.
The site would not meet the standards required for social housing.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.
The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.

Sound: No

Attachments: None

5642 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mrs Ruth Williams [3324]

Summary:

In June 2017, Llangan Action, the Community Council, and a traveller family agreed to vacate and transfer the site for community use, but the RLDP proposal contradicts this. The site is unsuitable for gypsy and traveller accommodation due to poor access, drainage, lack of public transport, and inappropriate size. It does not meet social housing standards and risks increasing tensions. Located in a protected landscape area, expansion conflicts with conservation aims and VOG objectives to promote community facilities, reduce travel needs, and protect the environment. The site's ownership does not justify its proposed expansion.

Full text:

In around June 2017, Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The proposal in the RLDP for the site is wholly contrary to what was agreed.
· The site is not suitable for the proposed use and does not meet the VOG's own criteria for a gypsy and traveller site, including because:
o Access is poor, with the lane being only 2.5m wide, which is less than the recommended access requirements for emergency vehicles of 3.7m. Extending the pitches would also restrict the ability of emergency vehicles to turn around on the site.
o The site is situated in low-lying land and has poor drainage.
o There is no public footpath near the site and no street lighting.
o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.
o The size of the site and number of pitches is not appropriate to its location and accommodation needs.
· Further:
o The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.
o The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
o The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.
o The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.
o The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
o The proposed development would also be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.
o The fact that the VOG owns the site does not in and of itself make it suitable for the proposed expansion.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.

· The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.

· New site grants are available and cost should not be a material planning consideration.

Sound: No

Attachments: None

5719 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mr Ian Tarr [3340]

Summary:

In June 2017, an agreement was made for the site to be vacated and transferred to the Community Council for community use, contrary to the RLDP proposal. The site is unsuitable for gypsy and traveller accommodation due to poor access, drainage, lack of public transport, and inappropriate size. It is in a protected landscape area and near a conservation area, which the expansion would harm. The site's transfer to the Community Council for allotments better aligns with local objectives to enhance community facilities, protect the environment, and reduce travel needs.

Full text:

· In around June 2017, Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The proposal in the RLDP for the site is wholly contrary to what was agreed.

· The site is not suitable for the proposed use and does not meet the VOG's own criteria for a gypsy and traveller site, including because:

o Access is poor, with the lane being only 2.5m wide, which is less than the recommended access requirements for emergency vehicles of 3.7m. Extending the pitches would also restrict the ability of emergency vehicles to turn around on the site.

o The site is situated in low-lying land and has poor drainage.

o There is no public footpath near the site and no street lighting.

o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.

o The size of the site and number of pitches is not appropriate to its location and accommodation needs.

· Further:

o The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.

o The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.

o The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.

o The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.

o The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.

o The proposed development would also be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

o The fact that the VOG owns the site does not in and of itself make it suitable for the proposed expansion.

Change suggested by respondent:

The site's transfer to the Community Council for allotments better aligns with local objectives to enhance community facilities, protect the environment, and reduce travel needs.

Sound: No

Attachments: None

5743 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mr Jonathan Vafidis [3081]

Summary:

This proposal is contrary to previous agreements between VOG and local representatives in 2017. The objections were based on the unsuitability of the site. It remains unsuitable for exactly the same reasons: it is in low lying land which is a flood risk, there are no amenities nearby, access is critically restricted, no footpaths or lighting, it is in and adjacent to protected areas.

Full text:

This proposal is contrary to previous agreements between VOG and local representatives in 2017. The objections were based on the unsuitability of the site. It remains unsuitable for exactly the same reasons: it is in low lying land which is a flood risk, there are no amenities nearby, access is critically restricted, no footpaths or lighting, it is in and adjacent to protected areas.

Change suggested by respondent:

This site remains wholly unsuitable for any expansion of traveller provision and indeed as per previous agreements and in the spirit of previous legal judgements against South Glamorgan Authority (1997) there should be action to close it and return the site to its original agricultural purpose

Sound: No

Attachments: None

5816 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Ms Frances Thornton [3356]

Summary:

I note that the proposed allocation of the Penllyn Glebe site conflicts with the 2017 agreement and a 1996 undertaking to vacate the site for agricultural use. The site is unsuitable for development due to access issues, flood risk, poor drainage, and safety concerns, especially as it does not meet the Council’s criteria for a gypsy and traveller site. Its location within a protected landscape area and lack of amenities further undermine its suitability. The proposal contradicts policies aimed at reducing travel, promoting sustainability, and protecting the environment.

Full text:

The proposed allocation of the Penllyn Glebe site disregards the agreement reached in 2017 between Llangan Action Group, Llangan Community Council and the traveller family occupying the site, for vacation of the site and subsequent lease to Llangan Community Council for community use.
Further, the Council is bound by an undertaking given in 1996, pursuant to Judicial Review proceedings, to use its best endeavours to achieve vacant possession and return the site to agricultural use. The residents have a legitimate expectation that this undertaking be complied with and the aforementioned agreement which took place in 2017 gave the residents the long-awaited assurance that the undertaking would be discharged.
Notwithstanding the above, a host of reasons exist which render the site unsuitable for the proposed use, added to which the proposal does not meet the criteria of the Vale of Glamorgan Council ("the Council") for a gypsy and travellers site.
Set out below are the reasons why the site fails to meet the Council's own criteria, t/w further issues which demonstrate the inadequacy of the site for the proposed use:
Access to the site is via a single file traffic lane of 2.5m width. The recommended access width for emergency vehicles is 3.7m Increased capacity would further frustrate the manoeuvrability of such vehicles which raises safety concerns that would be compounded by increased capacity.
The topography of the land in question renders it unsuitable for residential use. The site is situate on low-lying land which gives rise to a multiplicity of issues. There is a propensity for flooding which is exacerbated by the poor drainage, as reflected in the name of lane - historically known as "Waterston" or "Watery Lane". As a consequence, the site is damp and blanketed in a dense mist which gives rise to health issues that have been previously communicated to the Council.
As such, the proposal is contrary to the RLDP objective to:

"Ensure that all new development and infrastructure is resilient to future impacts arising from Climate Change. Direct development away from areas prone to flood risk …"

There is no public transport serving Llangan. The nearest bus service is 1.7 miles away on the A48 and the nearest railway stations are in Bridgend, approx 4.5 miles, and Llantwit Major, being 5 miles away.
This is compounded by unsafe pedestrian access. Llangan is known as an isolated rural village with narrow, unlit lanes which would not accommodate pavements. The lane adjacent the lane accessing the site is particularly dangerous in that children cannot walk or cycle to school; the only transport option being via car. Recent representations by National Grid to the Council concerning street lighting in the village met with the response that the deliverability of such would only be considered if petitioned by residents. Development in such an area is contrary to the Council's Active Travel policies and could not comply with, inter alia, the WG's transport and sustainability policies which actively encourage the use of public transport.
The proposals for the site go against the Council's own objective to reduce the need for travel for Vale of Glamorgan residents to meet their day-to-day needs as set out below.
The site is not reasonably accessible to public facilities, such as shops and community services and would not meet, eg day-to-day medical requirements, which are accessible in Cowbridge, some 7.5km from the site.
The site has no mains drainage and is served by a cesspit, the emptying costs of which are disproportionately high and would, arguably, be unaffordable. Connection to mains drainage is frequently not an option considered by WW, in rural locations, given costs/benefits.
The standards required for social housing are equally applicable to accommodation for the Gypsy and Traveller community and the site does not meet these standards.
The proposed site, given its location within a Special Landscape Area and adjacent Llangan Conservation Area, is contrary to the RLDP background paper, which acknowledges the importance of protecting views and landscape character within these areas.
Inclusion of the site in the RLDP is not in accordance with the Council's objective to protect and enhance the Council's historic, built and natural environment.
The RLDP objectives to mitigate the adverse affect of climate change and to promote community facilities would have been served, had the Council followed the assurance given to lease the land to Llangan Community Council, noting that the Council was aware of the Community Council's intention to use the land for allotment purposes, in line with the successful allotment scheme in place in the neighbouring village of Treoes.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework, previous legal commitments given in relation to the land, Welsh Government guidance and national planning policy.

The site should therefore be removed from the RLDP and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.

New site grants are available and costs of facilitating an alternative site should not be a material planning consideration.

Sound: No

Attachments: None

5865 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mr James Farrant [3402]

Summary:

In June 2017, an agreement was reached with the VOG to transfer the site to the Community Council for community use, but the RLDP proposal contradicts this. The site is unsuitable for the proposed gypsy and traveller pitches due to poor access, drainage, lack of public transport, and inappropriate size. It also does not meet social housing standards and risks community tension. Located in a sensitive landscape and conservation area, the expansion conflicts with environmental protection objectives and VOG's goals to reduce travel and promote community facilities. Ownership alone does not justify the expansion.

Full text:

In around June 2017, Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The proposal in the RLDP for the site is wholly contrary to what was agreed.

· The site is not suitable for the proposed use and does not meet the VOG's own criteria for a gypsy and traveller site, including because:

o Access is poor, with the lane being only 2.5m wide, which is less than the recommended access requirements for emergency vehicles of 3.7m. Extending the pitches would also restrict the ability of emergency vehicles to turn around on the site.

o The site is situated in low-lying land and has poor drainage.

o There is no public footpath near the site and no street lighting.

o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.

o The size of the site and number of pitches is not appropriate to its location and accommodation needs.

· Further:

o The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.

o The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.

o The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.

o The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.

o The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.

o The proposed development would also be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

o The fact that the VOG owns the site does not in and of itself make it suitable for the proposed expansion.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.

· The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.

· New site grants are available and cost should not be a material planning consideration

Sound: No

Attachments: None

5931 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mrs Gaye Bacon [3428]

Summary:

In June 2017, an agreement was reached for the site's vacation and transfer to the Community Council for community use, contrary to the RLDP proposal. The site is unsuitable for the proposed gypsy and traveller use due to poor access, drainage, lack of amenities, and its location in a designated landscape area. It does not meet social housing standards and could increase community tension. Transferring the site for allotments aligns better with VOG's environmental and community objectives, and ownership alone does not justify expansion suitability.

Full text:

· In around June 2017, Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The proposal in the RLDP for the site is wholly contrary to what was agreed.
· The site is not suitable for the proposed use and does not meet the VOG's own criteria for a gypsy and traveller site, including because:
o Access is poor, with the lane being only 2.5m wide, which is less than the recommended access requirements for emergency vehicles of 3.7m. Extending the pitches would also restrict the ability of emergency vehicles to turn around on the site.
o The site is situated in low-lying land and has poor drainage.
o There is no public footpath near the site and no street lighting.
o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.
o The size of the site and number of pitches is not appropriate to its location and accommodation needs.
· Further:
o The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.
o The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
o The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.
o The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.
o The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
o The proposed development would also be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.
o The fact that the VOG owns the site does not in and of itself make it suitable for the proposed expansion.

Change suggested by respondent:

· For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.
· The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.
· New site grants are available and cost should not be a material planning consideration.

Sound: No

Attachments: None

5954 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Llangan Community Council (Clerk) [239]

Summary:

Llangan Community Council object to expanding the Traveller site at Llangan. An agreement in 2017 mandated the site's transfer to the Community Council after most families moved to a new private site. The VOG has breached this agreement, and the site does not meet the VOG's own Gypsy and Traveller Accommodation Assessment criteria. Access is poor and unsafe, drainage is inadequate, and the location is unsuitable for increased pitches due to lack of services, transport, and community facilities. The proposed expansion conflicts with local policies, landscape protections, and previous commitments, and should be removed from the plan.

Full text:

Llangan Community Council (CC) would like to object to the proposed expansion of the Traveller site at Llangan.
In July 2017 there was a meeting between Llangan Community Council, Llangan Action and the traveller family occupying the site and an agreement was reached with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The current family was granted planning permission for their own private site and have mostly moved to the new location, just leaving a few family members on the original site to protect the land as requested by the VOG at the meeting. Our understanding was that the action taken by all parties fulfilled the requirements of the meeting and the land could now be transfer to the Community Council as agreed. The VOG have breached this agreement with no further discussion with the Community over the last 9 years.
Also in the opinion of the CC the site does not meet the criteria set in the VOG's own current Gypsy and Traveller Accommodation Assessment ("GTAA") and with reference to Policy MD18 (Gypsy and Traveler Accommodation).
The access lanes is too narrow (2.5m min) and can't be widened due to new houses built at the junction near Llangan Primary School. This could impact emergency vehicle access: the recommended access requirements for emergency vehicles is 3.7m. The alternative route through Llangan village is not suitable for emergency vehicles due to it having a weak bridge. Extending the proposal to 7 pitches on the site would further restrict the ability of emergency vehicles to manoeuvre around the site.
The fact that access is poor was recognised in the Report on the examination into the Vale of Glamorgan Local Development Plan 2011 – 2016, prepared by Richard E. Jenkins BA(Hons) MSc MRTPI, as Inspector appointed by the Welsh Ministers, dated 25 May 2017, which also found that drainage at the site was poor. The Report stated, "It is clear that access and drainage works would need to be improved for the site to meet Welsh Goverment guidance."1 These constraints remain relevant when considering the proposed significant expansion of the site.
Site access is "unsafe" having extended walks (in excess of 800m) along unlit land with no public footpath or street lighting.
The local area cannot support an increase from 2 to 7 pitches. The site is not reasonably accessible to day-to-day services, facilities and employment, medical facilities, shops and community facilities (there are no shops, restaurants, pubs/bars in the area) and there is no public transport. Cowbridge, the nearest town, is circa 7.5km from the site which is the nearest settlement providing a range of services. As there is no public transport serving the site and no local facilities within walking distance, the location therefore conflicts with the RLDP objective of reducing the need to travel and promoting sustainable transport.
The size of the site and number of pitches proposed is not appropriate to its location and accommodation needs. It does not meet the criteria for a safe, clean, and attractive area , where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity, and wellbeing. Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area."
The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.
The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
Notwithstanding the above, the independent inspector's report concluded the site was only suitable for 2 pitches after reviewing all the evidence. It is not clear what has changed for the VOG to conclude that a 350% increase in the number of pitches is suitable.
Mixing families from the Gypsy and Traveller community. The Welsh Government's approach to Gypsy and Traveller Accommodation Assessments (GTAA) emphasizes culturally appropriate, safe, and secure accommodation that meets the needs of families, rather than dictating the forced mixing of specific family groups on sites. The guidance was updated in March 2025.
In addition to being in a designated Special Landscape Area and the site is adjacent to the Llangan Conservation Area. The RLDP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion to seven pitches risks materially affecting the rural character and important views from the conservation area of Llangan.
The VOG's previous agreement in 2017 to return the site to the community for use as an allotment is a key illustration of achieving this objective. The proposed extension of the site for 7 pitches does not promote this objective, but wholly detracts from it. Llangan does not any other land to enhance and promote community facilities and services. Further, as the VOG is aware, the Community Council is not seeking funding from the VOG for the maintenance of the site which the VOG agreed to transfer management of to the Community Council.
The fact that the VOG own the site is not a reason on its own for extending the site from 2 to 7 pitches. Further, the fact that the VOG were, through its predecessors in time, party to a lawful undertaking to clear the site and return it to its previous agricultural status, coupled with the VOG's agreement to transfer the management of the site to the Community Council is evidence of a competing obligation in law for the use of the site.
For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments and community agreements made in 2017 relating to the land. The site should therefore be removed from the Replacement Local Development Plan and transferred to the Community Council to be used as a community space and allotments

Change suggested by respondent:

The agreement from 2017 should be upheld and the land transferred to the community.

Sound: No

Attachments: None

6061 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Llangan Action Group [3438]

Agent: Hugh James

Summary:

The proposed Llangan allocation is unsound in law and planning terms. It conflicts with the Council's 1996 undertaking, reinforced by later discussions, that the site would be vacated and restored, creating a legitimate expectation. It also conflicts with national policy and the Council's own policies requiring sustainable locations, safe access and appropriate scale. Llangan is a rural hamlet with poor services, limited public transport and unsuitable highway and drainage infrastructure. The proposal expands the site from two to seven pitches without adequate justification, harms the Special Landscape Area/conservation setting, and is not clearly deliverable or the most suitable site.

Full text:

1. Introduction

1.1 We act for the Llangan Action Group ("LAG") and are instructed by them to submit this letter of representation objecting to the proposed allocation and expansion of the Gypsy and Traveller site at Llangan (the "Site") within the Vale of Glamorgan Replacement Local Development Plan ("RLDP"). LAG respectfully submits that the proposed allocation should be removed from the RLDP. The proposal raises serious legal and planning concerns which go to the heart of whether the RLDP can properly be considered sound.

1.2 In particular, the proposed allocation is inconsistent with the Council's previous Undertaking (defined below) concerning the Site, conflicts with the Council's own planning policy framework and evidence base and fails to satisfy the recognised tests of soundness required for inclusion within the RLDP.

1.3 This representation therefore addresses both the legal issues arising from the Council's previous Undertaking and the planning merits of the proposed allocation. LAG recognises that the Council has statutory duties in relation to the accommodation needs of Gypsies and Travellers. However, the existence of such duties does not remove the requirement for site allocations within the development plan to be appropriate, sustainable, and supported by robust evidence.

2. Background and Planning History

2.1 The Site has a long and complex planning history which is directly relevant to the Council's current proposal to allocate and expand the Site within the RLDP. In December 1994, the former South Glamorgan County Council granted planning permission to itself for the use of the Site as a Gypsy site. That decision was subsequently challenged by local residents and ultimately quashed following judicial review proceedings in R v South Glamorgan County Council ex parte Harding (1997).

2.2 The High Court therefore confirmed that the planning permission granted by the Council was unlawful. The judicial review proceedings were significant not only because they resulted in the planning permission being quashed but also because they led to the Council giving a formal Undertaking concerning the future use of the land.

3. The Council's Undertaking

3.1 On 1 May 1996, during the course of the judicial review proceedings, the Chief Executive of the Council gave a formal Undertaking on behalf of the Council ("Undertaking"). The Undertaking was expressed to bind the Council and all successors in office and contained two key elements.

3.1.1 First, the Council undertook to use its best endeavours to remove the occupiers from the Site, including Mr William Carroll and any other persons occupying the Site.

3.1.2 Secondly, the Council undertook that once the Site became vacant it would remove all structures and services installed on the Site and restore the land to its original agricultural condition.

3.2 The clear intention of the Undertaking was therefore that the land should ultimately revert to its former use once the occupation had ceased. However, the RLDP now proposes to retain and expand the use of the land as a permanent Gypsy and Traveller site. This proposal is inconsistent with the Undertaking previously given by the Council.

3.3 In addition to the Undertaking given on 1 May 1996, the Council subsequently engaged in discussions with representatives of the LAG, the Community Council, and the occupiers of the Site with a view to resolving the long-standing issues relating to the Site. Minutes of a meeting held on 12 June 2017 between representatives of the Vale of Glamorgan Council, members of LAG and the occupier of the Site record that the Council acknowledged that, if the occupier and his family were to relocate or if the Site were otherwise vacated, the Site would effectively fall away from the Local Development Plan and could be returned to community use, including as allotments through the Community Council. The minutes further record that the Council indicated that the Site could be removed from the development plan at a future review stage once the occupation issue had been resolved.

3.4 This discussion is most significant because it demonstrates that the Council itself previously contemplated a resolution which was consistent with the Undertaking given in 1996 and with the expectation that the Site would ultimately revert to community or agricultural use rather than being expanded or retained as a permanent traveller site. The current proposal within the RLDP to allocate the Site for seven pitches therefore is inconsistent not only with the original Undertaking but also with the subsequent position discussed and agreed in principle between the Council and the members of LAG in 2017.

4. Legitimate Expectation

4.1 The Undertaking (together the with consensus reached at the meeting on 12 June 2017) given by the Council created

a clear legitimate expectation among local residents that the Site would ultimately be cleared and restored. The doctrine of legitimate expectation is well established in public law and arises where a public authority makes a clear representation or promise which it would be unfair or an abuse of power to depart from without compelling justification.
4.2 The leading authority is R v North and East Devon Health Authority ex parte Coughlan [2001] QB 213. In that case the Court of Appeal held that where a public authority makes a clear and unequivocal representation to a particular group of individuals, and those individuals reasonably rely upon that representation, the authority may be required to honour that promise unless it can demonstrate an overriding public interest which justifies departing from it. The Court recognised that in appropriate circumstances such representations may give rise to a substantive legitimate expectation, meaning that the authority is not merely required to consult before changing its position, but may be legally constrained from departing from the promise at all.
4.3 In the present case, the Undertaking given by the Council on 1 May 1996 was made in the context of judicial review proceedings and was relied upon by local residents when those proceedings were resolved. The Undertaking clearly indicated that the Council would use its best endeavours to remove the occupiers from the Site and would restore the land to its original condition once the occupation had ceased. Residents were therefore entitled to expect that the Council would act in accordance with that Undertaking and also the subsequent consensus reached at the June 2017 meeting.
4.4 Against that background, the Council's decision to promote the Site within the RLDP as a permanent Gypsy and Traveller allocation is inconsistent with the Undertaking previously given and may therefore amount to an unlawful frustration of the legitimate expectation created by that promise. In the absence of a compelling public interest justification, it would be difficult to reconcile the Council's current position with the principles established in Coughlan.

5. National Planning Policy
5.1 National planning policy contained within Planning Policy Wales ("PPW") emphasises that development should be directed to sustainable locations and that new development should minimise reliance on private car travel. PPW also emphasises the importance of ensuring that development contributes to the creation of sustainable communities.
5.2 Welsh Government guidance relating to Gypsy and Traveller sites similarly emphasises that such sites should normally be located close to services and facilities. The Site does not meet these criteria on any analysis. The Site is located in a small rural settlement with extremely limited services and facilities.

6. Conflict with Local Development Plan Policy
6.1 The proposed allocation also conflicts with the Council's own development plan policies. In particular, Policy MD18 (Gypsy and Traveller Accommodation) sets out the criteria against which proposals for Gypsy and Traveller sites must be assessed. The policy requires that such sites must be located in sustainable locations, must have safe and appropriate access, must be of a scale appropriate to their surroundings and must be capable of being adequately serviced.
6.2 These criteria are intended to ensure that Gypsy and Traveller sites are located in places where residents can reasonably access services and facilities and where development can take place without causing unacceptable impacts on the surrounding area.
6.3 The Site does not meet these requirements on any analysis. The Site is located within a small rural settlement which has extremely limited services and facilities. Essential services such as shops, healthcare facilities and other community services are not available within the village itself and are located in larger settlements some distance away.
6.4 In addition, access to the Site is via a narrow rural lane which is constrained in width and is unsuitable for the level of activity that would arise from an expanded site accommodating multiple pitches. These access constraints were previously identified during the examination of the Vale of Glamorgan Local Development Plan.
6.5 The scale of development proposed also raises significant concerns. The Planning Inspector previously concluded that the Site was suitable only for two pitches. The proposal to expand the Site to seven pitches therefore represents a substantial increase in scale which has not been adequately justified.
6.6 For these reasons, the proposed allocation fails to satisfy the criteria contained within Policy MD18 and is therefore inconsistent with the Council's own development plan policy framework.

7. Policy SP9 – Gypsy and Traveller Site Provision
7.1 Policy SP9 proposes to allocate land at Llangan for the provision of seven Gypsy and Traveller pitches. The supporting text states that the Site has capacity to accommodate seven pitches and that the principle of the Site's use as a Gypsy and Traveller site is well established.
7.2 However, the planning history demonstrates that the Site has been the subject of legal challenge and that the Council itself gave an undertaking requiring the land to be restored once the occupation ended.
7.3 In those circumstances, the assertion that the principle of the Site's use is well established is difficult to reconcile with both the legal history and the Undertaking previously given by the Council.

8. Policy GT1 – Gypsy and Traveller Accommodation
8.1 Policy GT1 sets out the criteria against which proposals for new Gypsy and Traveller sites, or extensions to existing sites, are to be assessed. The purpose of the policy is to ensure that any such sites are located in appropriate and sustainable locations and that development does not give rise to unacceptable impacts on surrounding communities or the environment.
8.2 The policy requires, amongst other matters, that sites must be reasonably accessible to essential services and facilities such as healthcare, education, employment opportunities and public transport. The intention behind this requirement is to ensure that residents of Gypsy and Traveller sites are able to access everyday services and participate fully in community life without being heavily dependent on private car travel.

8.3 The Site does not satisfy this requirement. Llangan is a small rural settlement with extremely limited services and facilities. The nearest town providing a wider range of services is Cowbridge, which lies approximately 7.5 kilometres from the Site. Public transport provision serving the area is limited and there are few local facilities within walking distance of the Site. As a result, residents would inevitably be heavily dependent on private vehicles in order to access essential services such as healthcare, education and employment.
8.4 Policy GT1 also requires that safe and appropriate vehicular access can be provided from the highway network and that the Site layout allows for adequate provision for parking, turning, servicing and emergency vehicles. These requirements reflect the need to ensure that Gypsy and Traveller sites can operate safely and effectively without creating highway safety concerns.
8.5 In the case of the Site, access is obtained via a narrow rural lane which is constrained in width and alignment. These access constraints were previously identified during the examination of the Vale of Glamorgan Local Development Plan. In that examination the Inspector concluded that access and drainage works would need to be improved for the Site to meet Welsh Government guidance. Those concerns remain relevant and it is not clear from the RLDP evidence base how they have been addressed.
8.6 Policy GT1 further requires that development should not have unacceptable impacts on the character and appearance of the landscape and should be sensitively designed to mitigate any impact on its surroundings. The Site lies within a designated Special Landscape Area and is located adjacent to the Llangan Conservation Area. These designations reflect the importance of protecting the landscape character and historic setting of the area.
8.7 The proposed expansion of the Site therefore raises significant concerns in relation to the potential impact on the surrounding landscape and the setting of the conservation area. The scale of the proposed development is likely to intensify activity at the Site and may therefore give rise to impacts which are inconsistent with the objectives of Policy GT1.
8.8 For these reasons, the proposed allocation of the Site fails to satisfy several of the key criteria contained within Policy GT1 and is therefore inconsistent with the policy framework set out in the RLDP.

9. Previous Inspector's Findings
9.1 The Inspector who examined the Vale of Glamorgan Local Development Plan previously considered the suitability of the Site in the context of the Council's earlier development plan process. The Inspector's report, which forms part of the evidence base for the adopted Local Development Plan, identified a number of concerns regarding the physical constraints affecting the Site.
9.2 In particular, the Inspector concluded that:
"It is clear that access and drainage works would need to be improved for the site to meet Welsh Government guidance."
9.3 The Inspector's conclusion is significant because it recognises that the Site is affected by fundamental infrastructure constraints which must be addressed before the Site could reasonably be considered suitable for development. Those concerns related in particular to the adequacy of the highway access serving the Site and the drainage arrangements necessary to support residential occupation.
9.4 These issues remain unresolved. The RLDP documentation does not clearly explain how the access and drainage concerns identified by the Inspector have now been addressed or how the necessary improvements would be delivered in practice. In circumstances where the Inspector previously identified these constraints as matters requiring improvement, it is incumbent upon the Council to demonstrate clearly that those issues have been satisfactorily resolved before relying upon the Site as a deliverable allocation within the RLDP.
9.5 In the absence of such evidence, the concerns previously identified by the Inspector remain relevant and cast doubt on the suitability and deliverability of the proposed allocation.

10. Sustainability and Location
10.1 Llangan is a small rural settlement with extremely limited services and facilities. The village does not contain the range of services that would normally be expected to support new residential development of the scale proposed within the RLDP.
10.2 The nearest settlement providing a wider range of services and facilities is Cowbridge, which lies approximately 7.5 kilometres from the Site. Essential services such as healthcare facilities, shops and employment opportunities are therefore located some distance away from the Site.
10.3 Public transport provision serving the area is extremely limited and there are no regular or convenient public transport connections serving the village of Llangan itself or linking the Site to Cowbridge or other nearby settlements. The nearest bus service operates along the A48, approximately 1.7 miles from the village. The nearest rail connections are located at Pencoed, approximately 4 miles (6.3km), Bridgend railway station, approximately 4.5 miles (7.3km) away, and Llantwit Major railway station, approximately 8 - 9 miles (13 – 15km) away. Distances are by road from the Site.
10.4 In practical terms, this means that residents of the proposed development would be required to travel some distance in order to access even basic public transport services. Access to those services is further constrained by the nature of the local road network. Pedestrian routes connecting the village to the wider transport network are limited and, in places, involve walking along rural roads which lack pavements and street lighting. These characteristics are typical of rural and relatively isolated locations and have been identified in various studies and reports examining accessibility issues affecting rural communities.
10.5 The absence of accessible public transport, together with the lack of safe and convenient pedestrian routes, means that residents of the proposed development would be heavily dependent on private vehicles in order to access employment, education, healthcare and other essential services. This raises concerns regarding the sustainability of the location when assessed against the relevant planning policy requirements.
10.6 As a result, residents of the proposed development would inevitably be heavily dependent on private vehicles in order to access everyday services and facilities. This level of reliance on private car travel is inconsistent with the RLDP's

stated objectives of promoting sustainable communities and reducing reliance on private vehicles.
10.7 The lack of accessible services is also directly relevant to Policy GT1, which requires Gypsy and Traveller sites to be reasonably accessible to essential services and facilities such as healthcare, education, employment and public transport. In circumstances where such services are not readily available, it is most difficult to conclude that the Site satisfies this requirement.
10.8 Access to the Site is provided by a narrow, single-lane track known as Waterston Lane. The lane is constrained in width and operates effectively as a single-file access route to the Site. The surrounding land is also known to be prone to flooding and waterlogging, which contributes to persistently damp conditions in the immediate area. These environmental conditions are relevant when considering the suitability of the Site for residential occupation.
10.9 During discussions held in 2017, the current occupier of the Site indicated that the damp conditions associated with the Site had resulted in respiratory health problems affecting members of his family. This observation highlights the potential implications of the Site's environmental conditions for the health and wellbeing of those living there.
10.10 In circumstances where the Site is known to experience damp and waterlogged conditions, careful consideration should be given to whether the Site provides an appropriate and sustainable environment for residential use, particularly if the scale of occupation is increased as proposed within the RLDP.

11. Scale of Development
11.1 The Planning Inspector examining the Vale of Glamorgan Local Development Plan previously concluded, after considering the available evidence, that the Site was suitable only for two pitches.
11.2 The proposal within the RLDP to expand the Site to seven pitches therefore represents a substantial increase in scale when compared with the level of development previously considered appropriate for the Site.
11.3 This represents a significant intensification of development which has not been supported by clear evidence demonstrating why such an increase is now considered acceptable.
11.4 The scale of the proposed development must also be considered in light of Policy GT1, which requires that the scale of a Gypsy and Traveller site should be proportionate to both the evidenced needs of the occupiers and the surrounding area.
11.5 In addition, earlier research undertaken for the Council, including the Fordham Research Group study on Gypsy and Traveller accommodation, indicated a preference among members of the Gypsy and Traveller community for smaller family-sized sites. The proposal to expand the Site significantly beyond its previously accepted capacity is therefore inconsistent with those findings.

12. Landscape and Environmental Impact
12.1 The Site lies within a designated Special Landscape Area and is located adjacent to the Llangan Conservation Area. These designations reflect the importance of protecting the landscape character and historic setting of the area.
12.2 Policy GT1 requires that development should not have unacceptable impacts on the character and appearance of the landscape and should be sensitively designed to mitigate any impacts on its surroundings. The expansion of the Site therefore raises concerns regarding the potential impact on the surrounding landscape and the setting of the conservation area.
12.3 In particular, the intensification of activity associated with a larger traveller site has the potential to introduce development which is out of keeping with the established rural character of the area.

13. Settlement Hierarchy
13.1 Evidence prepared by the Council as part of the Sustainable Settlements Appraisal identifies Llangan as a "Hamlet / Rural Area" within the settlement hierarchy. Settlements within this category are characterised by a limited range of services and infrastructure and are therefore not generally considered suitable locations for significant new development.
13.2 The settlement hierarchy forms an important part of the spatial strategy underpinning the development plan and is intended to ensure that development is directed to the most sustainable locations. Allocating and expanding a traveller site within a settlement identified as a rural hamlet is therefore inconsistent with the Council's own spatial strategy.

14. Deliverability
14.1 Site allocations within the RLDP must be realistic and capable of being delivered within the plan period. In the case of the Site, significant highway improvements would be required in order to make it suitable for development.
14.2 The evidence base supporting the RLDP does not clearly demonstrate that these improvements could be delivered within a reasonable timeframe. The Council's reliance on the fact that the Site is in its ownership does not in itself demonstrate that the Site is deliverable. The key issue is whether the necessary infrastructure improvements and environmental mitigation measures can be implemented in practice.
14.3 In circumstances where the deliverability of an allocation is uncertain, the allocation cannot reasonably be relied upon as a means of meeting identified accommodation needs.
14.4 The issue of drainage infrastructure at the Site also raises significant practical and financial concerns. The Site is not connected to the mains sewer network and is instead served by a cesspit. It is understood that the cost of emptying this cesspit has historically been approximately £200 per week. During earlier discussions it appears that the Council may have assumed that these costs were borne by the Site occupants. However, the occupier of the Site has clarified that the cost of emptying the cesspit has in fact been borne by the Council.
14.5 Even on the basis of the historic figure referred to during discussions in 2017, the ongoing maintenance cost associated with the cesspit is substantial. It is reasonable to assume that this cost will have increased significantly in the years since those discussions took place. Moreover, if the Site were expanded to accommodate multiple pitches as proposed under the RLDP, the frequency and cost of cesspit emptying would inevitably increase.

14.6 It is also understood that Welsh Water has previously indicated that connection to the main sewer network would not be feasible in rural locations such as Llangan. If that position remains unchanged, the Site will therefore continue to rely on cesspit infrastructure for the foreseeable future.
14.7 In those circumstances, the financial implications of the proposed allocation require careful consideration. If the costs associated with maintaining the drainage arrangements continue to fall on the Council, the expansion of the Site could result in a significant and ongoing financial burden on the local authority and, ultimately, on local taxpayers. The Council must therefore have regard to its duty to act in the best interests of its residents and to ensure the responsible use of public funds when assessing the appropriateness of this allocation.
14.8 Given these considerations, it would be appropriate for the Council to provide clarity regarding the current costs associated with maintaining the Site, including the ongoing cost of cesspit emptying and the extent to which those costs are borne by the Council.

15. Alternative Sites
15.1 Evidence previously produced in connection with the Local Development Plan indicates that a number of alternative sites exist which perform better when assessed against sustainability criteria. Those sites are considered to offer more sustainable locations with better access to services and infrastructure.
15.2 The RLDP supporting information does not adequately explain why these alternative sites have been rejected in favour of the Site. In the absence of such explanation, it is difficult to conclude that the site selection process has identified the most appropriate location for the proposed development.

16. Tests of Soundness
16.1 For a Local Development Plan to be adopted it must be considered sound.
16.2 In the context of the RLDP, this requires the plan to be justified, effective and consistent with national planning policy. The proposed allocation of the Site fails these tests of soundness.
16.3 In particular, the allocation is not justified by robust evidence, there is considerable doubt as to whether it is deliverable within the plan period, and it conflicts with national planning policy which seeks to direct development to sustainable locations.

17. Summary and Conclusion
17.1 In summary, the proposed allocation of the Site within the RLDP raises a number of serious legal and planning concerns which cast significant doubt on whether the allocation can properly be regarded as sound.
17.2 First, the allocation is inconsistent with the Council's previous Undertaking given on 1 May 1996 in the context of the judicial review proceedings in R v South Glamorgan County Council ex parte Harding, and the later consensus reached on 17 June 2017. Under that Undertaking the Council agreed to use its best endeavours to remove the occupiers from the Site and, once the Site became vacant, to remove the structures and restore the land to its original agricultural condition. The proposal within the RLDP to retain and expand the Site is therefore inconsistent with the Council's earlier Undertaking and gives rise to issues of legitimate expectation and potential public law unlawfulness.
17.3 Secondly, the proposed allocation conflicts with both national planning policy and the Council's own development plan policies. Planning Policy Wales emphasises that development should be directed to sustainable locations and that new development should minimise reliance on private car travel. Policy MD18 of the adopted Local Development Plan and Policy GT1 of the RLDP similarly require Gypsy and Traveller sites to be located in sustainable locations with safe and appropriate access and to be of a scale appropriate to their surroundings. The Site does not meet these criteria.
17.4 Thirdly, the Site is located in a small rural settlement with extremely limited services and facilities. Essential services such as shops, healthcare and employment opportunities are located in Cowbridge, approximately 7.5 kilometres away, and public transport provision serving the Site is extremely limited. Residents would therefore be heavily dependent on private vehicles in order to access basic services, which is inconsistent with the objectives of sustainable development.
17.5 Fourthly, the Planning Inspector examining the Vale of Glamorgan Local Development Plan previously identified concerns regarding the suitability of the Site, concluding that access and drainage works would need to be improved in order for the Site to meet Welsh Government guidance. Those concerns remain unresolved and it is not clear from the RLDP evidence base how they have now been addressed.
17.6 Fifthly, the proposed expansion represents a significant intensification of development at the Site. The Planning Inspector previously concluded that the Site was suitable only for two pitches, yet the RLDP now proposes to expand the Site to seven pitches. No clear evidence has been provided to justify this substantial increase.
17.7 The Site also lies within a Special Landscape Area and adjacent to the Llangan Conservation Area, raising concerns regarding the impact of the proposed development on the character and appearance of the surrounding landscape.
17.8 In addition, the Council's own evidence base identifies Llangan as a "Hamlet / Rural Area" within the settlement hierarchy. Settlements within this category are not intended to accommodate significant new development and allocating a larger traveller site in this location is therefore inconsistent with the Council's spatial strategy.
17.9 Finally, there are serious concerns regarding the deliverability and justification of the allocation. Significant highway improvements would be required to make the Site suitable for development, and it is unclear how these improvements would be delivered within the plan period. Evidence previously produced also indicates that alternative sites exist which perform better when assessed against sustainability criteria.
17.10 In these circumstances the proposed allocation cannot properly be regarded as justified, effective or consistent with national planning policy and therefore fails the recognised tests of soundness required for adoption of the RLDP.
17.11 For all of these reasons, the allocation of land at Llangan for the provision of Gypsy and Traveller pitches should be removed from the RLDP on any view.

Change suggested by respondent:

Please refer to the previous section above.

Sound: No

Attachments:

6091 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Llangan Community Council (Clerk) [239]

Summary:

I object on behalf of Mr William Carroll, who lacks website access but verbally conveyed his concerns. He is very angry about the VOG's plan to expand the site to seven pitches and offer them to strangers with no family ties. He recalls a 2017 agreement where the site was to be vacated and transferred to the Community Council, which has not been honoured. He believes the area cannot support more pitches, citing lack of local services, public transport, and inadequate drainage, making the expansion unfair and unsuitable.

Full text:

Llangan Community Council make the following objection on behalf of Mr William Carroll as he does not have access to the website, however he has verbally communicated the following with Llangan Community Councillors.
Mr Carroll's current position is that he is very angry about the VOG proposing to expand the site again and offer the 7 pitches to people he doesn't know and has no family connections with.
In July 2017 there was a meeting between Llangan Community Council, Llangan Action and the traveller family occupying the site and an agreement was reached with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The current family was granted planning permission for there own private site and have mostly moved to the new location, just leaving a few family members on the original site to protect the land as requested by the VOG at the meeting. Our understanding was that the action taken by all parties fulfilled the requirements of the meeting and the land could now be transfer to the Community Council as agreed. The VOG have breached this agreement with no further discussion with the Community over the last 9 years.
I hear from the Community Council that the VOG are new proposing to expand the Llangan site to 7 pitches. I am concerned and angry about proposal to expand the site again and to offer the 7 pitches to people I don't know and have no connection with. This is very unfair on the community and my family.
The local area cannot support an increase from 2 to 7 pitches. The site is not reasonably accessible to services, facilities, employment, medical facilities, shops and community facilities (there are no shops, restaurants, pubs/bars in the area) and there is no public transport. Cowbridge, the nearest town, is circa 7.5km from the site which is the nearest settlement providing a range of services. There is no public transport serving the site. No mains drainage on only a cesspit and this could not support any additional people.

Change suggested by respondent:

The site should be removed from the plan and the asset transferred to the community as agreed in 2017.

Sound: No

Attachments: None

6104 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mrs Elizabeth Davey [3476]

Summary:

In June 2017, an agreement was made for the site to be transferred to the Community Council for community use, but the RLDP proposal contradicts this. The site is unsuitable for the proposed use due to poor access, drainage, lack of public transport, and its location in a conservation area. It does not meet standards for social housing or community needs, risking community tension. The expansion conflicts with environmental, landscape, and climate objectives, and owning the site does not automatically justify its development.

Full text:

· In around June 2017, Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The proposal in the RLDP for the site is wholly contrary to what was agreed.
· The site is not suitable for the proposed use and does not meet the VOG's own criteria for a gypsy and traveller site, including because:
o Access is poor, with the lane being only 2.5m wide, which is less than the recommended access requirements for emergency vehicles of 3.7m. Extending the pitches would also restrict the ability of emergency vehicles to turn around on the site.
o The site is situated in low-lying land and has poor drainage.
o There is no public footpath near the site and no street lighting.
o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.
o The size of the site and number of pitches is not appropriate to its location and accommodation needs.
· Further:
o The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.
o The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
o The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.
o The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.
o The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
o The proposed development would also be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.
o The fact that the VOG owns the site does not in and of itself make it suitable for the proposed expansion.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.
· The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.
· New site grants are available and cost should not be a material planning consideration.

Sound: No

Attachments: None

6105 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mrs Elizabeth Davey [3476]

Summary:

In 2017, Llangan Action, the Community Council, and a traveller family agreed to transfer the site to serve the community, but the RLDP proposal contradicts this. The site is unsuitable due to poor access, drainage, lack of public transport, and inappropriateness for social housing. Its location in a conservation area and landscape zone further opposes expansion. The proposed increase in pitches could cause community tension and conflicts with environmental and development objectives, despite the VOG's ownership. The site's transfer for community use as allotments aligns better with the VOG's goals.

Full text:

In around June 2017, Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The proposal in the RLDP for the site is wholly contrary to what was agreed.

· The site is not suitable for the proposed use and does not meet the VOG's own criteria for a gypsy and traveller site, including because:

o Access is poor, with the lane being only 2.5m wide, which is less than the recommended access requirements for emergency vehicles of 3.7m. Extending the pitches would also restrict the ability of emergency vehicles to turn around on the site.

o The site is situated in low-lying land and has poor drainage.

o There is no public footpath near the site and no street lighting.

o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.

o The size of the site and number of pitches is not appropriate to its location and accommodation needs.

· Further:

o The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.

o The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.

o The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.

o The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.

o The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.

o The proposed development would also be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.

o The fact that the VOG owns the site does not in and of itself make it suitable for the proposed expansion.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.

· The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.

· New site grants are available and cost should not be a material planning consideration.

Sound: No

Attachments: None

6192 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mrs Helen Hammond [3490]

Summary:

The proposal is not in line with the VOG own criteria. It is not inline with the agreement made by VOG with the community in 2017 or the undertaking made in 1996. The community should be able to trust VOG to keep to its own agreements and support the community to provide facilities for all to use. The expansion to 7 pitches is way beyond what the inspector previously found to be acceptable at this location. It does not provide for a sustainable future community for Llangan for all residents including the current occupants of the site.

Full text:

In around June 2017, Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The proposal in the RLDP for the site is wholly contrary to what was agreed.

· The site is not suitable for the proposed use and does not meet the VOG's own criteria for a gypsy and traveller site, including because:
o Access is poor, with the lane being only 2.5m wide, which is less than the recommended access requirements for emergency vehicles of 3.7m. Extending the pitches would also restrict the ability of emergency vehicles to turn around on the site.
o The site is situated in low-lying land and has poor drainage.
o There is no public footpath near the site and no street lighting.
o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.
o The size of the site and number of pitches is not appropriate to its location and accommodation needs.
· Further:
o The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.
o The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
o The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.
o The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.
o The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
o The proposed development would also be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.
o The fact that the VOG owns the site does not in and of itself make it suitable for the proposed expansion.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.

· The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.

· New site grants are available and cost should not be a material planning consideration.

Sound: No

Attachments: None

6235 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Ms Helen Bigley [3500]

Summary:

In June 2017, an agreement was reached for the site's transfer to the Community Council for community use, but the RLDP proposal contradicts this. The site is unsuitable for the proposed gypsy and traveller pitches due to poor access, drainage, lack of public transport, and its location in a sensitive landscape area. It does not meet social housing standards, risks community tension, and conflicts with VOG's objectives to protect the environment, reduce travel needs, and enhance community facilities. The site's ownership does not justify its expansion.

Full text:

• In around June 2017, Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The proposal in the RLDP for the site is wholly contrary to what was agreed.
• The site is not suitable for the proposed use and does not meet the VOG's own criteria for a gypsy and traveller site, including because:
o Access is poor, with the lane being only 2.5m wide, which is less than the recommended access requirements for emergency vehicles of 3.7m. Extending the pitches would also restrict the ability of emergency vehicles to turn around on the site.
o The site is situated in low-lying land and has poor drainage.
o There is no public footpath near the site and no street lighting.
o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.
o The size of the site and number of pitches is not appropriate to its location and accommodation needs.
• Further:
o The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.
o The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
o The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.
o The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.
o The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
o The proposed development would also be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.
o The fact that the VOG owns the site does not in and of itself make it suitable for the proposed expansion.

Change suggested by respondent:

The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.

Sound: No

Attachments: None

6243 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mrs Juliana Wines [3503]

Summary:

In June 2017, an agreement was reached for the site to be vacated and transferred to the Community Council for community use, but the RLDP proposal contradicts this. The site is unsuitable for the proposed gypsy and traveller use due to poor access, drainage, absence of public transport, and inadequate size. It fails to meet social housing standards and risks community tension. Located in a protected landscape area, expansion would harm landscape views and contradict objectives to reduce travel needs, protect the environment, and promote community facilities. Ownership alone does not justify development.

Full text:

· In around June 2017, Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The proposal in the RLDP for the site is wholly contrary to what was agreed.
· The site is not suitable for the proposed use and does not meet the VOG's own criteria for a gypsy and traveller site, including because:
o Access is poor, with the lane being only 2.5m wide, which is less than the recommended access requirements for emergency vehicles of 3.7m. Extending the pitches would also restrict the ability of emergency vehicles to turn around on the site.
o The site is situated in low-lying land and has poor drainage.
o There is no public footpath near the site and no street lighting.
o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.
o The size of the site and number of pitches is not appropriate to its location and accommodation needs.
· Further:
o The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.
o The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
o The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.
o The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.
o The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
o The proposed development would also be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.
o The fact that the VOG owns the site does not in and of itself make it suitable for the proposed expansion.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.
· The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.
· New site grants are available and cost should not be a material planning consideration.

Sound: No

Attachments: None

6484 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mr Richard Brian Antuch [3065]

Summary:

I oppose the extension of the Gypsy and Traveller site at Llangan, citing legal and community concerns. The site's previous planning permission was quashed, and the Council has not fulfilled its obligation to remove structures or revert the land to agriculture, despite a 2017 agreement and a legal undertaking. The site is unsuitable due to poor access, drainage, lack of nearby facilities, and its location within a Special Landscape Area. Expanding to seven pitches conflicts with local policies, community objectives, and the site's environmental and historical significance. I recommend removing it from the development plan and identifying better alternatives

Full text:

Response to SP9 (Gypsy and Traveller Site Provision) & GT1 (Gypsy Traveller Accommodation)
Location – Land at Llangan (the "Site")
Primary objection
The Site was the subject of judicial review proceedings.
The former South Glamorgan County Council granted itself planning permission to use the Site as a gypsy site on 20 December 1994. The High Court quashed the planning permission, such that it had no standing in law (R v South Glamorgan County Council ex parte Harding (1997).
In connection with the judicial review proceedings, the Council, through its the Chief Executive,
Mr Foster, entered into a formal undertaking dated 1 May 1996 (the "Undertaking"). The Undertaking was made for the benefit of the wider Llangan community and required the Council to use its best endeavours to remove the occupiers from the Site and, once the Site became va
cant, to remove all structures and services and restore the Site to its original agricultural position.
Notwithstanding that the Undertaking was given some time ago, the Council remain bound by
the same, as they have not yet complied with its terms.
Further, in around June 2017, Llangan Action Group, Llangan Community Council and the traveller family occupying the Site reached an agreement with key members of the Council for the Site to be vacated, and for the Site to be transferred to the Community Council for use by the community.
The discussions and agreement reached in around June 2017 were the result of much time and
effort by all parties and the result would have allowed the Council to discharge the Undertaking it had agreed to be bound by.
For reasons that I believe were not explained, the Council reneged on the agreement without notice or explanation, such that the terms of the legally binding Undertaking are yet to be dis charged.
The proposal to extend the Site to accommodate 7 pitches was received as a surprise in light of the above, as to increase the number of pitches goes completely against what was agreed and goes against the doctrine of legitimate expectation.
Whilst it is appreciated that the Council has an obligation under the Housing (Wales) Act 2014
to make provision for the gypsy and traveller community, it is not clear on what basis the Council has identified a single site to fulfil its obligation in respect of which it is bound by an under taking to return to agricultural land.

Secondary abjection – Suitability of the Site
Notwithstanding the above, the Site is not suitable in any event. It is again surprising how the Council has identified this as the only single suitable site without providing justification to why other alternative sites were not put forward. A list of reasons is set out below. These are not intended to be exhaustive, but illustrative of why the Site is considered unsuitable:
The Site does not meet the criteria set in the VOG's own current Gypsy and Traveller Accommodation Assessment ("GTAA") and with reference to Policy MD18 (Gypsy and Traveler Accommodation), including because:
Access to the Site is poor. The lane is narrow (circa 2.5m). As such, it does not meet the recommended access requirements for emergency vehicles of is 3.7m.
The alternative route through Llangan village is not suitable for emergency vehicles due to it having a weak bridge.
Extending the proposal to 7 pitches on the Site would further restrict the ability of emergency vehicles to manoeuvre around the Site.
The fact that access is poor was recognised in the Report on the examination into the Vale of Glamorgan Local Development Plan 2011 – 2016, prepared by Richard E. Jenkins BA(Hons) MSc MRTPI, as Inspector appointed by the Welsh Ministers, dated 25 May 2017, which also found that drainage at the Site was poor. The Report stated, "It is clear that access and drainage works would need to be improved for the site to meet Welsh Government guidance.". These constraints remain relevant when considering the proposed significant expansion of the Site. The issue with drainage near the Site can be seen from the photograph below. No changes have been made since 2017, such that the same issues remain.
Site access is "unsafe" having extended walks (in excess of 800m) along unlit land with no public footpath or street lighting.
The local area cannot support an increase from 2 to 7 pitches. The Site is not reasonably accessible to day-to-day services, facilities and employment, medical facilities, shops and community facilities (there are no shops, restaurants, pubs/bars in the area) and there is no public transport in Llangan. The nearest train station is in
Pencoed, which is over 6km away by road. Cowbridge, the nearest town, is circa 7.5km from the Site which is the nearest settlement providing a range of services. As there is no public transport serving the Site and no local facilities within walking distance, the location therefore conflicts with the RLDP objective of reducing the need
to travel and promoting sustainable transport.
The size of the Site and number of pitches proposed is not appropriate to its location and accommodation needs.
The Cardiff and Vale of Glamorgan Survey and Assessment of Gypsy and Traveller Accommodation – Final Report – August 2008, prepared by the Fordham Research Group Limited made a finding that there was a preference for members of the Gypsy / Traveller community for smaller, family-sized sites. The expansion of the Site to 7 pitches is wholly contrary to the findings of the report commissioned for the benefit and assistance of the VOG.
9.3 The Replacement Local Development Plan 2021 – 2036: Issues, Vision and Objectives June 2023 (Background Paper – BP2) states, at 4.1. that: "Our Vision for the Vale of Glamorgan is a place:
• That is safe, clean, and attractive, where individuals and communities have sustainable opportunities to improve their health, learning and skills, prosperity, and wellbeing; and
• Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to

make an effective contribution to the future sustainability of the area."

The RLDP objectives are set out at paragraph 5 as follows:

To sustain and further the development of sustainable communities within the VOG, providing opportunities for living, learning, working and socialising for all.

The location of the Site does not support this objective.

To ensure that development within the VOG makes a positive contribution towards reducing the impact of and mitigating the adverse effects of Climate Change. In respect of mitigating climate change,it is stated this means:

"Encourage development that reduces the need to travel by car and encourage people to participate in active travel and use sustainable transport to reduce emissions and improve air quality.

Ensure that all new development and infrastructure is reliant to future impacts arising from Climate Change, Direct development away from areas prone to flood risk and incorporate water management, biodiversity enhancement and adaptation measures."

Development of the Site will not contribute towards this objective. In particular, as stated above, the lack of public transport will no doubt result in multiple vehicles being used to transport to and from the Site. Such a need could be avoided if the allocation requirement was situated in an area with better public transport / an area close to facilities such as healthcare etc.

Alternatively, the agreement previously reached with the VOG to return the Site to the Community Council for use as allotments would have a positive impact in respect of climate change, not least due to the fact that produce would be grown locally. The success of allotments in Treoes has demonstrated the viability of such a programme and the VOG had previously indicated its support for returning the Site to the Community Council for such a purpose.

To reduce the need to VOG residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport.

As above, the Site does not meet this objective due to its distance from facilities such as healthcare, shops etc. and the lack of public transport.

To protect and enhance the VOG's historic, built, and natural environment.

The proposal would adversely impact the undeveloped rural character of the area.

To maintain, enhance and promote community facilities and services in the VOG.

The VOG's previous agreement to return the Site to the community for use as an allotment is a key illustration of achieving this objective. The proposed extension of the Site for 7 pitches does not promote this objective, but wholly detracts from it. Llangan does not any other land to enhance and promote community facilities and services. Further, as the VOG is aware, the Community Council is not seeking funding from the VOG for the maintenance of the Site which the VOG agreed to transfer management of to the Community Council.

To provide the opportunity for people in the VOG to meet their housing needs.

It is accepted the VOG has a lawful duty under section 101(1) of the Housing (Wales) Act 2014 to carry out an assessment of the accommodation needs of Gypsies and Travellers residing in its area. That is not disputed. The fact that the VOG has a legal requirement to meet this legal obligation does not, however, mean that the selection of an unsuitable Site is acceptable to 'tick a box' to meet that obligation is acceptable.
The fact that the VOG own the Site is not a reason on its own for extending the Site from 2 to 7 pitches. Further, the fact that the VOG were, through its predecessors in time, party to a lawful undertaking to clear the Site and return it to its previous agricultural status, coupled with the VOG's agreement to transfer the management of the Site to the Community Council is evidence of a competing obligation in law for the use of the Site.

To ensure that development within the VOG uses land effectively and efficiently and to promote the sustainable use and management of natural resources.

As above, this objective would not be met by extending the Site to accommodate 7 pitches. Further, this is agricultural land in a Special Landscaped Area.

Further:
The Site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.

The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.

Notwithstanding the above, the independent inspector's report concluded the Site was only suitable for 2 pitches after reviewing all the evidence. It is not clear what
has changed for the VOG to conclude that a 350% increase in the number of pitches is suitable.

Mixing families from the Gypsy and Traveller community. The Welsh Government's approach to Gypsy and Traveller Accommodation Assessments (GTAA) emphasizes
culturally appropriate, safe, and secure accommodation that meets the needs of families, rather than dictating the forced mixing of specific family groups on sites. The
guidance was updated in March 2025.

The assessment makes no reference that the Site is in a Special Landscape Area.

The Replacement Local Development Plan 2021 – 2036: Special Landscape Area – Background Paper – BP-28, November 2025, provides at para 1.6: "The designation of the SLA was not intended to prevent development, but to ensure that where development was acceptable, careful consideration was given to the design elements of the proposal such as the siting, orientation, layout and landscaping, to ensure that the special qualities and characteristics for which the SLAs have been designated are protected."

In addition to being in a designated Special Landscape Area, the Site is adjacent to the Llangan Conservation Area. The RLDP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion to seven pitches risks materially affecting the rural character and
important views from the conservation area.
Conclusion
For the reasons set out above, the allocation of the Site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land. It is also highly questionable whether it would
be deliverable within the plan period given the substantial and costly work that would be required at the Site, such as dealing with the drainage issue.

The Site should therefore be removed forthwith from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.
New site grants are available and cost should not be a material planning consideration.

Change suggested by respondent:

Site should therefore be removed forthwith from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.

Sound: Not specified

Attachments:

Email Representations Redacted - https://valeofglamorgan.oc2.uk/a/3qm

6948 Object

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Mr & Mrs Annie and John Williams [3325]

Summary:

Objection to the local development plan's consideration of the unauthorised travellers site east of Llangan, specifically its continuation and enlargement from two to seven pitches. The site has a long history of legal issues, including judicial reviews and directives to revert to agricultural use. In 2017, it was agreed that the land should be transferred to Llangan Community Council for village use, but it remains unsuitable due to lack of transport, difficult access, inadequate sewage, and absence of community facilities.

Full text:

We are writing to object to part of the local development plan, specifically the consideration that the unauthorised travellers site located to the east of Llangan village should
1. Be continued (by inference from point 2
2. Be enlarged from a 2 to a 7 pitch site
I hope you are aware of the long history of the site which has been a subject of concern since the early 1990s and has been the subject of judicial and local reviews and legal action on numerous times, which directed the then S Glam Authority to return the disputed land to its previous agricultural use.
Subsequently in 2017 it was agreed with the VoG that the land should be transferred to Llangan Community Council for use as a village community site , a position confirmed with Marcus Goldsworthy and the planning department in 2022.
Additional land for village use is needed as at present we have no play areas or outside community space for the children and families who live in the village
Other reasons the site is unsuitable for multiple occupation
The village and surrounding land has no public transport
Access to the site is difficult and unsuitable for large
Inadequate sewage system
We await your response with interest

Change suggested by respondent:

-

Sound: Not specified

Attachments:

3325 Williams [6849] Redacted - https://valeofglamorgan.oc2.uk/a/3d6

6993 Comment

Document Element: SP9 - GYPSY AND TRAVELLER SITE PROVISION

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Water Supply - The nearest watermain is approximately 100 metres from the site.
Wastewater - The nearest sewer is approximately 350 metres from the site.
Wastewater Treatment Works - Penybont Merthyr Mawr is the nearest WwTW catchment to the site.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.

Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
Our representations on the site allocations are included in appendix 2.
We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the ‘domestic’ supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.

Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site
Our representations on site allocations are provided in the table below. The following caveats are applicable to all sites:
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion.
• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
The following provisions are applicable to all allocated employment sites:
• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
• Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcements.
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

4982 Object

Document Element: GT1 - GYPSY AND TRAVELLER ACCOMMODATION
Respondent: Emma Reed [2653]

Summary:
Is this actually deliverable as the site has been discussed for years and never delivered?

Full text:
Is this actually deliverable as the site has been discussed for years and never delivered?

Change suggested by respondent:
Show that the site can actually be delivered in the next 10 years

Sound: No
Attachments: None

5351 Object

Document Element: GT1 - GYPSY AND TRAVELLER ACCOMMODATION
Respondent: Mrs Annie Price [3238]

Summary:
The proposed expansion does not meet the criteria set out below. The site is not reasonably accessible to essential services and facilities. Access is poor and there is limited space for emergency vehicles. There are no public transport links. Previous independent reports have identified problems with access and drainage. The proposed site is in a designated special landscape area and adjacent to the Llangan Conservation area.

Full text:
The proposed expansion does not meet the criteria set out below. The site is not reasonably accessible to essential services and facilities. Access is poor and there is limited space for emergency vehicles. There are no public transport links. Previous independent reports have identified problems with access and drainage. The proposed site is in a designated special landscape area and adjacent to the Llangan Conservation area.

Change suggested by respondent:
As per the points above, the site does not meet the criteria as described below so alternative sites should be identified.

Sound: No
Attachments: None

5489 Object

Document Element: GT1 - GYPSY AND TRAVELLER ACCOMMODATION
Respondent: Mrs Janet Reed OBE [3269]

Summary:
The site is totally unsuitable- there is no public transport and no accessible healthcare within 4miles.There are no amentities. Access is too narrow in parts to comply with emergency service requirements. Doesn't meet standards for social housing. It's on a flood plane, increasing to 7 pitches makes the scale disproportionate. There is no drainage, waste water provision is via cesspit. Costs of upgrading site would not meet value for money criteria. Site is close to Llangan Conservation Area and is a Special Landscape Area.

Full text:
The site is totally unsuitable- there is no public transport and no accessible healthcare within 4miles.There are no amentities. Access is too narrow in parts to comply with emergency service requirements. Doesn't meet standards for social housing. It's on a flood plane, increasing to 7 pitches makes the scale disproportionate. There is no drainage, waste water provision is via cesspit. Costs of upgrading site would not meet value for money criteria. Site is close to Llangan Conservation Area and is a Special Landscape Area.

Change suggested by respondent:
The site should be removed from the plan. It is inconsistent with the councils policy framework and doesn't meet the criteria set out in the Gypsy and traveller accomodation Assessment and Policy MD18.
It breaches exisitng legal commitments relating to the site - the judicail review and 2017 agreement made between VOG, LCC and the site occupier.

Sound: No
Attachments: None

5547 Object

Document Element: GT1 - GYPSY AND TRAVELLER ACCOMMODATION

Respondent: Mr John Melville [3289]

Summary:

I believe the site should not be used for the proposed purpose because it conflicts with legal undertakings, current planning policies, and its suitability. The site's poor access, lack of facilities, and location in a Special Landscape Area make it inappropriate for expansion to seven pitches. It contradicts the Council's objectives for sustainable communities, environmental protection, and efficient land use. Additionally, an earlier agreement to convert the site into allotments was revoked by the VOG without discussion. The site should be removed from the plan, and alternative locations better aligned with policy criteria should be identified.

Full text:

The site should not be used for the proposed purpose or for any other purpose by the VOG as a consequence of the following:

• The Council (under its previous iteration) previously granted planning permission to itself for use of the site as a gypsy site on 20 December 1994. That decision was subsequently quashed by the High Court in R v South Glamorgan County Council ex parte Harding (1997). Following those proceedings, the Council through its Chief Executive, Mr Foster, entered into a formal undertaking dated 1 May 1996 requiring that once the existing family vacated the site, the Council would restore the land to its
original agricultural condition. That undertaking remains binding and has not been discharged. The proposed allocation and expansion of the site appears inconsistent with that undertaking and raises questions as to whether the Council can lawfully promote the site for further development.

July 2017 meeting with the VOG.
Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. Had the VOG done so, it would have discharged the obligations it had bound itself to under the undertaking. The VOG have, however, without any explanation, gone back on that agreement without any further discussions with the Community.

In any event, the site does not meet the criteria set in the VOG's own current Gypsy and Traveller Accommodation Assessment ("GTAA") and with reference to Policy MD18 (Gypsy and Traveler Accommodation), including because:

• Access to the site is poor. The access lanes is too narrow (2.5m min) and can't be widened due to new houses built at the junction near Llangan Primary School. This could impact emergency vehicle access: the recommended access requirements for emergency vehicles is 3.7m

• The alternative route through Llangan village is not suitable for emergency vehicles due to it having a weak bridge.

• Extending the proposal to 7 pitches on the site would further restrict the ability of emergency vehicles to manoeuvre around the site.

• The fact that access is poor was recognised in the Report on the examination into the Vale of Glamorgan Local Development Plan 2011 – 2016, prepared by Richard E. Jenkins BA(Hons) MSc MRTPI, as Inspector appointed by the Welsh Ministers, dated 25 May 2017, which also found that drainage at the site was poor. The Report stated, "It is clear that access and drainage works would need to be improved for the site to meet Welsh Goverment guidance."1 These constraints remain relevant when considering the proposed significant expansion of the site.

• Site access is "unsafe" having extended walks (in excess of 800m) along unlit land with no public footpath or street lighting.

• The local area cannot support an increase from 2 to 7 pitches. The site is not reasonably accessible to day-to-day services, facilities and employment, medical facilities, shops and community facilities (there are no shops, restaurants, pubs/bars in the area) and there is no public transport. Cowbridge, the nearest town, is circa 7.5km from the site which is the nearest settlement providing a range of services. As there is no public transport serving the site and no local facilities within walking distance, the location therefore conflicts with the RLDP objective of reducing the need to travel and promoting sustainable transport.

• The size of the site and number of pitches proposed is not appropriate to its location and accommodation needs.

• The Cardiff and Vale of Glamorgan Survey and Assessment of Gypsy and Traveller Accommodation – Final Report – August 2008, prepared by the Fordham Research Group Limited made a finding that there was a preference for members of the Gypsy / Traveller community for smaller, family sized sites. The expansion of the site to 7 pitches is wholly contrary to the findings of the report commissioned for the benefit and assistance of the VOG.

• The Replacement Local Development Plan 2021 – 2036: Issues, Vision and Objectives June 2023 (Background Paper – BP2) states, at 4.1. that:

• "Our Vision for the Vale of Glamorgan is a place:
o That is safe, clean, and attractive, where individuals and communities have sustainable opportunities to improve their

health, learning and skills, prosperity, and wellbeing; and
o Where there is a strong sense of community in which local groups and individuals have the capacity and incentive to make an effective contribution to the future sustainability of the area."

• The RLDP objectives are set out at paragraph 5 as follows:

RDLP objective Comment
To sustain and further the development of sustainable communities within the VOG, providing opportunities for living, learning, working and socialising for all.
The location of the site does not support this objective.
To ensure that development within the VOG makes a positive contribution towards reducing the impact of and mitigating the adverse effects of Climate Change. In respect of mitigating climate change, it is stated this means: "Encourage development that reduces the need to travel by car and encourage people to participate in active travel and use sustainable transport to reduce emissions and improve air quality.
Ensure that all new development and infrastructure is reliant to future impacts arising from Climate Change, Direct development away from areas prone to flood risk and incorporate water management, biodiversity enhancement and adaptation measures."
Development of the site will not contribute towards this objective. In particular, as stated above, the lack of public transport will no doubt result in multiple vehicles being used to transport to and from the site. Such a need could be avoided if the allocation requirement was situated in an area with better public transport / an area close to facilities such as healthcare etc.

Alternatively, the agreement previously reached with the VOG to return the site to the Community Council for use as allotments would have a positive impact in respect of climate change, not least due to the fact that produce would be grown locally. The success of allotments in Treoes has demonstrated the viability of such a programme and the VOG had previously indicated its support for returning the site to the Community Council for such a purpose.
To reduce the need to VOG residents to travel to meet their daily needs and enabling them greater access to sustainable forms of transport.
As above, the site does not meet this objective due to its distance from facilities such as healthcare, shops etc. and the lack of public transport.
To protect and enhance the VOG's historic, built, and natural environment.
The proposal would adversely impact the undeveloped rural character of the area.
To maintain, enhance and promote community facilities and services in the VOG.
The VOG's previous agreement to return the site to the community for use as an allotment is a key illustration of achieving this objective. The proposed extension of the site for 7 pitches does not promote this objective, but wholly detracts from it. Llangan does not any other land to enhance and promote community facilities and services. Further, as the VOG is aware, the Community Council is not seeking funding from the VOG for the maintenance of the site which the VOG agreed to transfer management of to the Community Council.

To provide the opportunity for people in the VOG to meet their housing needs.
It is accepted the VOG has a lawful duty under section 101(1) of the Housing (Wales) Act 2014 to carry out an assessment of the accommodation needs of Gypsies and Travellers residing in its area. That is not disputed. That fact that the VOG has a legal requirement to meet this legal obligation does not, however, mean that the selection of an unsuitable site is acceptable to 'tick a box' to meet that obligation is acceptable.

The fact that the VOG own the site is not a reason on its own for extending the site from 2 to 7 pitches. Further, the fact that the VOG were, through its predecessors in time, party to a lawful undertaking to clear the site and return it to its previous agricultural status, coupled with the VOG's agreement to transfer the management of the site to the Community Council is evidence of a competing obligation in law for the use of the site.

To ensure that development within the VOG uses land effectively and efficiently and to promote the sustainable use and management of natural resources.
As above, this objective would not be met by extending the site to accommodate 7 pitches. Further, this is agricultural land in a Special Landscaped Area.

Further:

• The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.
• The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
• Notwithstanding the above, the independent inspector's report concluded the site was only suitable for 2 pitches after reviewing all the evidence. It is not clear what has changed for the VOG to conclude that a 350% increase in the number of pitches is suitable.
• Mixing families from the Gypsy and Traveller community. The Welsh Government's approach to Gypsy and Traveller Accommodation Assessments (GTAA)
emphasizes culturally appropriate, safe, and secure accommodation that meets the needs of families, rather than

dictating the forced mixing of specific family groups on sites. The guidance was updated in March 2025.

The assessment makes no reference that the site is in a Special Landscape Area. The Replacement Local Development Plan 2021 – 2036: Special Landscape Area – Background Paper – BP-28, November 2025, provides at para 1.6:
"The designation of the SLA was not intended to prevent development, but to ensure that where development was acceptable, careful consideration was given to the design elements of the proposal such as the siting, orientation, layout and landscaping, to ensure that the special qualities and characteristics for which the SLAs have been designated are protected."

In addition to being in a designated Special Landscape Area and the site is adjacent to the Llangan Conservation Area. The RLDP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion to seven pitches risks materially affecting the rural character and important views from the conservation area.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.

The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18

New site grants are available and cost should not be a material planning consideration.

Sound: No

Attachments: None

5932 Object

Document Element: GT1 - GYPSY AND TRAVELLER ACCOMMODATION

Respondent: Mrs Gaye Bacon [3428]

Summary:

In June 2017, Llangan Action, the Community Council, and a traveller family agreed on vacating and transferring the site for community use, but the RLDP proposal contradicts this. The site is unsuitable for the proposed gypsy and traveller pitches due to poor access, drainage issues, lack of public transport, and inappropriate size. It also fails to meet social housing standards, risks community tension, and threatens local landscape and conservation areas. Transferring the site to the Community Council for allotments would better align with VOG's objectives to promote community facilities, reduce travel needs, and

Full text:

· In around June 2017, Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The proposal in the RLDP for the site is wholly contrary to what was agreed.
· The site is not suitable for the proposed use and does not meet the VOG's own criteria for a gypsy and traveller site, including because:
o Access is poor, with the lane being only 2.5m wide, which is less than the recommended access requirements for emergency vehicles of 3.7m. Extending the pitches would also restrict the ability of emergency vehicles to turn around on the site.
o The site is situated in low-lying land and has poor drainage.
o There is no public footpath near the site and no street lighting.
o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.
o The size of the site and number of pitches is not appropriate to its location and accommodation needs.
· Further:
o The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.
o The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
o The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.
o The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.
o The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
o The proposed development would also be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.
o The fact that the VOG owns the site does not in and of itself make it suitable for the proposed expansion.

Change suggested by respondent:

· For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.
· The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.
· New site grants are available and cost should not be a material planning consideration.

Sound: No

Attachments: None

6185 Object

Document Element: GT1 - GYPSY AND TRAVELLER ACCOMMODATION

Respondent: Mr Darren Wines [3487]

Summary:

In June 2017, an agreement was made for the site to be transferred to the Community Council for community use, but the RLDP proposal contradicts this. The site is unsuitable due to poor access, drainage, lack of public transport, and its location in a conservation area. It does not meet standards for social housing or the VOG's criteria for gypsy and traveller sites. Expanding the site risks community tension, conflicts with landscape protections, and opposes the VOG's objectives to reduce travel needs and preserve the environment. Ownership alone does not justify expansion.

Full text:

· In around June 2017, Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The proposal in the RLDP for the site is wholly contrary to what was agreed.
· The site is not suitable for the proposed use and does not meet the VOG's own criteria for a gypsy and traveller site, including because:
o Access is poor, with the lane being only 2.5m wide, which is less than the recommended access requirements for emergency vehicles of 3.7m. Extending the pitches would also restrict the ability of emergency vehicles to turn around on the site.
o The site is situated in low-lying land and has poor drainage.
o There is no public footpath near the site and no street lighting.
o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.
o The size of the site and number of pitches is not appropriate to its location and accommodation needs.
· Further:
o The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.
o The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
o The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.
o The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.
o The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
o The proposed development would also be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.
o The fact that the VOG owns the site does not in and of itself make it suitable for the proposed expansion.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.
· The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.
· New site grants are available and cost should not be a material planning consideration.

Sound: No

Attachments: None

6208 Object

Document Element: GT1 - GYPSY AND TRAVELLER ACCOMMODATION

Respondent: Mrs Helen Hammond [3490]

Summary:

The site is poorly accessible, lacking nearby services, shops, and public transport, contradicting RLDP goals to reduce travel and promote sustainability. Access is narrow and unsuitable for emergency vehicles, with alternative routes also inadequate. Expanding to seven pitches would worsen emergency access, harm the rural character, and alter residents' living conditions. It would increase traffic and safety risks, especially for children, and undermine a 2017 agreement to develop allotments. Flooding and drainage issues would worsen, making the site unsanitary and environmentally damaging to the village's conservation area and protected views.

Full text:

The site is not reasonably accessible to day-to-day services, facilities and employment, medical facilities, shops and community facilities (there are no shops, restaurants, pubs/bars in the area) and there is no public transport. Cowbridge, the nearest town, is circa 7.5km from the site which is the nearest settlement providing a range of services. As there is no public transport serving the site and no local facilities within walking distance, the location therefore conflicts with the RLDP objective of reducing the need to travel and promoting sustainable transport.he lack of public transport will no doubt result in multiple vehicles being used to transport to and from the site. Such a need could be avoided if the allocation requirement was situated in an area with better public transport / an area close to facilities such as healthcare etc.Access to the site is poor. The access lanes is too narrow (2.5m min) and can't be widened due to new houses built at the junction near Llangan Primary School. This could impact emergency vehicle access: the recommended access requirements for emergency vehicles is 3.7m. The alternative route through Llangan village is not suitable for emergency vehicles due to it having a weak bridge. Extending the proposal to 7 pitches on the site would further restrict the ability of emergency vehicles to manoeuvre around the site.

The WG inspector has already found the site unacceptable for expansion to 7 pitches the proposals would fundamentally change the living circumstances of the current residents. 7 pitches on that site would cramped and change the rural character of the site. bringing a mixture of families together on 7 pitches is contrary to the cultural needs of the current occupants and the WG guidance for GTAA.

Llangan is a small community. the expansion would have a negative impact on the nature of the village, increasing traffic and pedestrian use of the roads that are unlit, with no footpath, creating a danger to residents, particularly the children using the local school. the agreement made in 2017 would have resulted in the site becoming allotments that would be of benefit to all residents, promote local growing and a positive adaptation to climate change. going back on that agreement is a lost opportunity for Llangan.

the lane is often flooded and the current resident has has problems with the drainage and waste on the site. this would be made much worse by increasing the occupancy of the site to be unsanitary, dangerous and unhealthy environment of anyone to live in.

The rural nature of the village, the conservation area and protected views would all be negatively by such a significant expansion.

Change suggested by respondent:

The agreement of 2017 between VOG and the community should be honoured and the site returned to the community for community facilities and allotments that are much needed in the village. The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.

Sound: No

Attachments: None

6217 Object

Document Element: GT1 - GYPSY AND TRAVELLER ACCOMMODATION

Respondent: Mrs Elana Farrant [2789]

Summary:

In June 2017, an agreement was reached to vacate the site and transfer it to the Community Council for community use, contrary to the RLDP proposal. The site is unsuitable for gypsy and traveller pitches due to poor access, drainage, lack of amenities, and its location in a conservation area. It does not meet social housing standards, risks community tension, and conflicts with environmental and landscape protections. Transferring the site for allotments would better align with VOG's objectives to promote community facilities, reduce travel needs, and protect the environment.

Full text:

· In around June 2017, Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The proposal in the RLDP for the site is wholly contrary to what was agreed.
· The site is not suitable for the proposed use and does not meet the VOG's own criteria for a gypsy and traveller site, including because:
o Access is poor, with the lane being only 2.5m wide, which is less than the recommended access requirements for emergency vehicles of 3.7m. Extending the pitches would also restrict the ability of emergency vehicles to turn around on the site.
o The site is situated in low-lying land and has poor drainage.
o There is no public footpath near the site and no street lighting.
o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.
o The size of the site and number of pitches is not appropriate to its location and accommodation needs.
· Further:
o The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.
o The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
o The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.
o The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.
o The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
o The proposed development would also be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.
o The fact that the VOG owns the site does not in and of itself make it suitable for the proposed expansion

Change suggested by respondent:

· For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.
· The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.
· New site grants are available and cost should not be a material planning consideration.

Sound: No

Attachments: None

6238 Object

Document Element: GT1 - GYPSY AND TRAVELLER ACCOMMODATION

Respondent: Ms Helen Bigley [3500]

Summary:

In June 2017, Llangan Action, the Community Council, and a traveller family agreed to vacate the site for community use. However, the RLDP proposal contradicts this agreement. The site is unsuitable due to poor access, drainage issues, lack of public amenities, and its location in a sensitive landscape area. The site does not meet VOG criteria for gypsy and traveller sites, nor social housing standards. The proposed expansion risks community tension and conflicts with landscape protection policies.

Full text:

In around June 2017, Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The proposal in the RLDP for the site is wholly contrary to what was agreed.

• The site is not suitable for the proposed use and does not meet the VOG's own criteria for a gypsy and traveller site, including because:

o Access is poor, with the lane being only 2.5m wide, which is less than the recommended access requirements for emergency vehicles of 3.7m. Extending the pitches would also restrict the ability of emergency vehicles to turn around on the site.

o The site is situated in low-lying land and has poor drainage.

o There is no public footpath near the site and no street lighting.

o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.

o The size of the site and number of pitches is not appropriate to its location and accommodation needs.

• Further:

o The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.

o The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.

o The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.

Change suggested by respondent:

The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.

Sound: No

Attachments: None

6245 Object

Document Element: GT1 - GYPSY AND TRAVELLER ACCOMMODATION

Respondent: Mrs Juliana Wines [3503]

Summary:

In June 2017, an agreement was reached for the site's transfer to the community council for use by the community, which contradicts the RLDP proposal. The site is unsuitable due to poor access, drainage, lack of public transport, and its location in a conservation area. It does not meet standards for social housing or community needs and risks increasing local tensions. Transferring the site to the council for allotments aligns better with VOG's objectives to promote community, mitigate climate change, and protect the natural environment. The site's ownership alone does not justify its expansion.

Full text:

In around June 2017, Llangan Action, Llangan Community Council and the traveller family occupying the site reached an agreement with the VOG for vacation of the site and for the site to be transferred to the Community Council for use by the community. The proposal in the RLDP for the site is wholly contrary to what was agreed.
· The site is not suitable for the proposed use and does not meet the VOG's own criteria for a gypsy and traveller site, including because:
o Access is poor, with the lane being only 2.5m wide, which is less than the recommended access requirements for emergency vehicles of 3.7m. Extending the pitches would also restrict the ability of emergency vehicles to turn around on the site.
o The site is situated in low-lying land and has poor drainage.
o There is no public footpath near the site and no street lighting.
o There is no public transport and the site is not reasonably accessible to day-to-day services, such as medical facilities, shops and community facilities. Cowbridge is around 7.5km from the site.
o The size of the site and number of pitches is not appropriate to its location and accommodation needs.
· Further:
o The site would not meet the standards required for social housing. The same standards apply for housing for the Gypsy and Traveller community.
o The scale of the proposed number of pitches poses a real risk of escalating fear and tension within the local community, which would be contrary to encouraging and developing good relations between Gypsy Travellers and the settled community.
o The site is in a Special Landscape Area and adjacent to the Llangan Conservation Area. The RDLP background paper acknowledges the importance of protecting views and landscape character within these areas. The proposed expansion is contrary to that view.
o The agreement reached with the VOG to transfer the site to the Community Council for use as allotments (following the success of a similar project in the neighbouring village of Treoes) would better meet the VOG's vision to in its RLDP objectives to mitigate the adverse effects of climate change and to enhance and promote community facilities and services in the VOG.
o The proposed expansion of the site goes against the VOG's objective to reduce the need for travel for VOG residents to meet their daily needs.
o The proposed development would also be contrary to the VOG's object to protect and enhance the VOG's historic, built and natural environment.
o The fact that the VOG owns the site does not in and of itself make it suitable for the proposed expansion.

Change suggested by respondent:

For the reasons set out above, the allocation of the site at Llangan for additional Gypsy and Traveller pitches is not justified and is inconsistent with the Council's own policy framework and previous legal commitments relating to the land.
· The site should therefore be removed from the Replacement Local Development Plan and alternative sites identified which better meet the criteria set out in the Gypsy and Traveller Accommodation Assessment and Policy MD18.
· New site grants are available and cost should not be a material planning consideration.

Sound: No

Attachments: None

6628 Comment

Document Element: GT1 - GYPSY AND TRAVELLER ACCOMMODATION

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.

We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.
Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.
Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have

been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where "qualifying activities" take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states 'The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.'
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning

stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery. Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)
identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.
South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf

South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and

existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a

range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for

operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

4604 Object

Document Element: SP10 - SUSTAINABLE TRANSPORT

Respondent: Mr David Barton [2683]

Summary:

This doesn't work in reality alienating outsiders from investing here.

Full text:

Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.

This doesn't work in reality alienating outsiders from investing here.

Change suggested by respondent:

reverse this step and make the area easy to navigate by motor vehicle including free car parking en masse.

Sound: No

Attachments: None

4983 Object

Document Element: SP10 - SUSTAINABLE TRANSPORT

Respondent: Emma Reed [2653]

Summary:

Rhoose is taking some 10 percent of increased development yet there are no improvements to rail or bus services. The Plan allocates St Athan Rail land without any evidence it will be delivered. As a minimum there should be two trains an hour in Rhoose BEFORE any new development is even considered. Same with buses a minimum of 2 per hour. The active travel route to Weycock Cross also must be completed. If the developments at Rhoose cannot provide such enhancements the developments must not happen as the Plan would be unsound having not considered appropriate infrastructure.

Full text:

Rhoose is taking some 10 percent of increased development yet there are no improvements to rail or bus services. The Plan allocates St Athan Rail land without any evidence it will be delivered. As a minimum there should be two trains an hour in Rhoose BEFORE any new development is even considered. Same with buses a minimum of 2 per hour. The active travel route to Weycock Cross also must be completed. If the developments at Rhoose cannot provide such enhancements the developments must not happen as the Plan would be unsound having not considered appropriate infrastructure.

Change suggested by respondent:

Before any development in Rhoose better transport facilities as identified above must be provided. This is essential to make the Plan sound. Without them the Plan is unsound.

Sound: No

Attachments: None

5348 Comment

Document Element: SP10 - SUSTAINABLE TRANSPORT
Respondent: Professor Andrew Vincent [920]

Summary:

The bus to the airport has been at best a variable and very infrequent item. Most people who are looking not to pay for airport parking will regularly park their car, sometimes for several weeks, in Pontypridd Road and then get a taxi to and from the airport. My wife and I have seen this too many times to count. The airport bus has been too infrequent and too unreliable for most people.

Full text:

The bus to the airport has been at best a variable and very infrequent item. Most people who are looking not to pay for airport parking will regularly park their car, sometimes for several weeks, in Pontypridd Road and then get a taxi to and from the airport. My wife and I have seen this too many times to count. The airport bus has been too infrequent and too unreliable for most people.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

5349 Comment

Document Element: SP10 - SUSTAINABLE TRANSPORT
Respondent: Professor Andrew Vincent [920]

Summary:

A regular public transport from Port Road area to either Dinas or Cardiff would indeed be welcome. But in the fifteen years we have lived here in Pontypridd Road there has been no such buses at all

Full text:

A regular public transport from Port Road area to either Dinas or Cardiff would indeed be welcome. But in the fifteen years we have lived here in Pontypridd Road there has been no such buses at all

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

5363 Object

Document Element: SP10 - SUSTAINABLE TRANSPORT
Respondent: Professor Andrew Vincent [920]

Summary:

This bus service is unreliable and has dropped in an out of usage over the last decade. It is also infrequent and not easy to concide with flights. Many wishing to use the airport or avoid airport parking charges will park their cars in Pontypridd Road - sometimes for two or more weeks and get a taxi to the airport.

Full text:

This bus service is unreliable and has dropped in an out of usage over the last decade. It is also infrequent and not easy to concide with flights. Many wishing to use the airport or avoid airport parking charges will park their cars in Pontypridd Road - sometimes for two or more weeks and get a taxi to the airport.

Change suggested by respondent:

A fully reliable regular service would be helpful and one that stops near Weycock Cross!

Sound: No
Attachments: None

5529 Comment

Document Element: SP10 - SUSTAINABLE TRANSPORT

Respondent: Mrs Hilary May [2309]

Summary:

Ensure active travel provision is in place before people move into new housing. All sites have potential to improve active travel for existing residents as well as new residents, reducing car dependency. Ensure active travel routes go beyond the sites to places people want to travel to and link with other active travel routes. Ebikes in particular have a real potential to reduce car use so ensure safe cycle storage for all households is included in plans. Improve access to public transport eg lifts at stations and better bus links to services.

Full text:

Ensure active travel provision is in place before people move into new housing. All sites have potential to improve active travel for existing residents as well as new residents, reducing car dependency. Ensure active travel routes go beyond the sites to places people want to travel to and link with other active travel routes. Ebikes in particular have a real potential to reduce car use so ensure safe cycle storage for all households is included in plans. Improve access to public transport eg lifts at stations and better bus links to services.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5583 Support

Document Element: SP10 - SUSTAINABLE TRANSPORT

Respondent: Ms Samantha Hall [1432]

Summary:

We need hourly trains from Llantwit Major and trains from Llantwit and Rhoose straight into Cardiff. You can drive to Cardiff in the same time it takes to get the train from Llantwit Major and therefore there is no incentive to take public transport, particularly if you have to wait for 45 minutes for the next train.

Full text:

We need hourly trains from Llantwit Major and trains from Llantwit and Rhoose straight into Cardiff. You can drive to Cardiff in the same time it takes to get the train from Llantwit Major and therefore there is no incentive to take public transport, particularly if you have to wait for 45 minutes for the next train.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5656 Object

Document Element: SP10 - SUSTAINABLE TRANSPORT

Respondent: Mr David Entwistle [3264]

Summary:

The plan does not go into enough depth in how to council plans to realistically deliver and encourage active travel options. At present public transport services fall far short of the route network and frequency required to make them a realistic alternative for most journeys. Concrete, realistic and deliverable improvements need to be included in the LDP rather than simple vague promises.

Full text:

The plan does not go into enough depth in how to council plans to realistically deliver and encourage active travel options. At present public transport services fall far short of the route network and frequency required to make them a realistic alternative for most journeys. Concrete, realistic and deliverable improvements need to be included in the LDP rather than simple vague promises.

Change suggested by respondent:

The council needs to commit to expanding the bus network and providing subsidies if required. Better bus linkups to train stations need to be provided along with additional parking at current stations. The timetables need to be overhauled and increased frequencies of services as at present even residents wanting to take public transport to a place of work in Cardiff for example cannot due to a range of factors. The LDP needs to actually lay out how these improvements can be achieved.

Sound: No

Attachments: None

5911 Object

Document Element: SP10 - SUSTAINABLE TRANSPORT

Respondent: HBF (Mr Mark Harris) [538]

Summary:

Point 6 of the policy should be reworded, as it is not for a developer to provide transport services, at best and only where required as a direct result of the proposed development; they can contribute towards transport services provided by others.

The wording 'As appropriate, new development proposals will be required to provide Transport Statements, Transport Assessments and Travel Plans to ensure the delivery of travel choice and sustainable opportunities for travel.' is considered to be too vague. There is no clarification on when it would be 'appropriate' and in what scenario would one or all of the reports mentioned be required.

Further, the supporting text para. 6.187 does not really provide any specific guidance to support this policy requirement. At what stage in the planning process would it be decided that one or all of these documents are required, and based on what criteria? This lack of clarity could lead to delays in the delivery of new homes and uncertainty for developers.

Full text:

Point 6 of the policy should be reworded, as it is not for a developer to provide transport services, at best and only where required as a direct result of the proposed development; they can contribute towards transport services provided by others.

The wording 'As appropriate, new development proposals will be required to provide Transport Statements, Transport Assessments and Travel Plans to ensure the delivery of travel choice and sustainable opportunities for travel.' is considered to be too vague. There is no clarification on when it would be 'appropriate' and in what scenario would one or all of the reports mentioned be required.

Further, the supporting text para. 6.187 does not really provide any specific guidance to support this policy requirement. At what stage in the planning process would it be decided that one or all of these documents are required, and based on what criteria? This lack of clarity could lead to delays in the delivery of new homes and uncertainty for developers.

Change suggested by respondent:

Point 6 should be reworded as follows:

'Contribute to new or enhanced transport services and facilities where appropriate.'

Clear criteria should be set for when the various highway reports are required to be submitted with an application.

Sound: Yes

Attachments: None

6678 Comment

Document Element: SP10 - SUSTAINABLE TRANSPORT

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built. Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.
We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.
Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.
Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it

within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at: https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where "qualifying activities" take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states 'The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and

25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.'
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery. Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)
identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.

South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local

health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism

(protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver

especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of

new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

6725 Comment

Document Element: SP10 - SUSTAINABLE TRANSPORT

Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel Act guidance (Link: https://www.gov.wales/sites/default/files/publications/2022 01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing flooding and making use more comfortable during hot weather (such as shading from trees).

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning guidance (SPG) proposed. We are keen to ensure that these SPG's are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are involved in the development of some of these. The content and application of the SPG's will be fundamental to the effectiveness of several of the policies identified in the deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: "The Local Development Plan will support resilient and sustainable local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part of sustainable growth."

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it

does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local
diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

“Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other
opportunities for local food production as part of multifunctional green infrastructure.”

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their
proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative
impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

6.54 We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live
full, productive and prosperous lives.'

6.60 We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid
HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to
ensure Developers submit a quality HIA and implement the conclusions.

6.61 Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

6.62 Wales Health Impact Assessment Support Unit has recently released guidance on HIA - see https://phwwhocc.co.uk/whiasu/ for more information and toolkits to ensure most up to date is in use.

6.63 Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the community..'.

6.65 Suggestion to change wording from 'encouraged' to 'expected' for example:
Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement
for HIA will assist with this expectation.

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference “enhancements to leisure, sport and recreation spaces”. Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation. It is recommended that the Key Site schedules include minimum on-site provision standards and delivery
phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population
growth.

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail
centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer
supply chains. This limits opportunities for strengthening local food economies.
It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for ‘local affordable food’ outlined in SP5.

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach.”

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to
consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and
Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: “Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food
infrastructure within walking distance of new residential areas.” This addresses diet related health inequalities, encourages healthier communities and aligns with HIA
guidance.

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply
chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable
agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models.

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses - to include the following wording: “Rural diversification proposals that support agro-ecological farming, sustainable local food production,
community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations.”

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel
Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022
01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing
flooding and making use more comfortable during hot weather (such as shading from trees). We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

SP13 Community infrastructure and planning obligations:

We want to take this opportunity to highlight the challenges that population growth places on healthcare
services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure. Please refer to the information provided as part of the background evidence paper titled 'BP37
Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within
existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new
developments to take forward its strategic objectives.

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space Assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres. Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.”
There is no reference to the expectation that local communities are consulted in relation to the development of community facilities. We would like to see a
requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and
challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities
that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales’ push for local supply resilience, this is a major opportunity gap. Consider including the following wording:

“Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains.” This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or
urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: “Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing.”

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food
production, short supply chains or sustainable farming practices.
Consider including the following wording: “Development proposals should encourage short supply chains, low-carbon farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives.”

Change suggested by respondent:

We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

6784 Support

Document Element: SP10 - SUSTAINABLE TRANSPORT
Respondent: Persimmon Homes (East Wales) [1068]
Agent: Boyer Planning

Summary:

Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives.

Full text:

This submission relates to the site known as ‘Land North of Dinas Powys’ and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 ‘Land North of Dinas Powys’.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government’s tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements “offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs”.
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan’s strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon

emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be

considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.
Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.
In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at

Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of

provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.

In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).

In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.

Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement

From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and

strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.

As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.

Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.

Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.

Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.

Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.

In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

Policy SP2 – Settlement Hierarchy

In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.

Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.

Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.

Policy SSC1 – Development within Settlement Boundaries

Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.

Policy SP4 – Placemaking

In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.

The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of

the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.

In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car. Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.

The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.

Policy PGD1 – Creating Well Designed and Inclusive Places

Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.

On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.

Policy PGD2 – Residential Development Densities

Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.

From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.

A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.

The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.

Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.

Policy SP5 – Creating Healthy & Inclusive Places and Spaces

Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.

The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.

The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through

the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in

nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
Loss of Allocated Employment Land
Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
Policy HG3 – Housing Led Redevelopment Opportunity
Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are

removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.

This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.

Policy SP7 – Affordable Housing Provision

In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.

As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.

National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.

To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.

Policy SP8 – Affordable Housing Requirements

Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.

On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.

Policy SP10 – Sustainable Transport

Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.

In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.

In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.

Policy TR1 – Transport Proposals

Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more

sustainable modes of travel.
In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.
Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.
Policy SP13 – Community Infrastructure and Planning Obligations
Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
Policy CI1 – Open Space Provision
Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.
The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.
Productive and Enterprising Places
Policy CC1 – Residential Operational Net Zero Carbon Development
Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.
Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.
The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.
Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.
Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.
Distinctive and Natural Places
Policy SP19 – Green Infrastructure
In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures

that protect and enhance green infrastructure provision.
For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.
The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.
Policy SP20 – Biodiversity and Ecosystem Resilience
In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.
Policy DNP1 – Special Landscape Areas
Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.
Policy DNP2 – Green Wedges
Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.
Policy DNP8 – Severn Estuary Recreational Pressure
Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
Conclusion
Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes' most pertinent comments on the consultation document are summarised below:
• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/38r

6917 Support

Document Element: SP10 - SUSTAINABLE TRANSPORT

Respondent: Barratt Redrow Homes [2669]

Agent: Boyer Planning

Summary:

Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives.

Full text:

1. INTRODUCTION
1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.
1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:
• Section 3 – The Vale of Glamorgan Key Characteristics;
• Section 4 – RLDP Key Themes, Vision, and Objectives;
• Section 5 – Sustainable Growth Strategy; and
• Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.
1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS
Settlement Pattern
2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.
2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Need
2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
3. RLDP KEY THEMES, VISION, AND OBJECTIVES
3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.
Key Themes
3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future

growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY
Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South

Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the

average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.

5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.

5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.

5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

5.10 For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

5.11 More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

5.12 Whilst Barratt Redrow appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range, having reviewed the Deposit Plan evidence base Barratt Redrow believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.

5.13 In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

5.14 Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).

5.15 In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

5.16 In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need. Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036) and therefore is made up of

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.
5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.
5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.
5.27 In summary, Barratt Redrow acknowledge the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
5.28 These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance and additional site allocations, such as Swn Y Coed, Wenvoe, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
5.29 Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.
5.30 Accordingly, despite Wenvoe being identified as a primary settlement, Policy SP2 notes that development in this location will be limited to 'the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.' Similarly, it is noted that Policy SP2 does not consider Wenvoe to be an appropriate location for ''substantial additional growth''.
5.31 Barratt Redrow object to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified.
5.32 First of all, the Deposit Plan acknowledges that it performs a similar function to the Primary Settlements located

within the Strategic Growth Area and it is described as one of the 'sustainable communities' in The Vale of Glamorgan Key Characteristics section, as noted previously in Section 3.
5.33 Likewise, the site benefits from excellent accessibility the local public transport network, active travel routes and local services. These characteristics fully accord with Welsh Government's strategic objectives and emphasise the fact that Swn Y Coed constitutes an appropriate location for future housing.
5.34 With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge''. Barratt Redrow do not consider this to be sufficient justification to discount the site from allocation as there would be limited impact on BMW agricultural land arising from the development of Swn Y Coed.

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available.
5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.
Policy SP4 - Placemaking
5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.
5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.
5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.
5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.
5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
Policy PGD1 – Creating Well Designed and Inclusive Places
5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA

requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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Unsustainable Location & Poor Connectivity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.

• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.
• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.
• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.
• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.
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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or

indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply
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• HG1 (8) St Athan - Clive Road, St Athan

Policy HG3 – Housing Led Redevelopment Opportunity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need.

Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).
• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires

policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4).Finally, the Council's own Viability Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.
• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.
• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:
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Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:
i. Space heating demand less than or equal to 40kWh/m2/year;
ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.
• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate

measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
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Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established 'defensible' limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be 'largely shielded from view by woodland blocks/strips'.
• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for 'infilling' the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual

considerations.
• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
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Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute “visitor pressure” or an “adverse impact” on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan’s ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
•

Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.
• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.

• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
•

MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
•
• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
•
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
•

CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the Council's vision for the VoG.
• 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
• 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
•

6. CONCLUSION
• Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.
• Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a

higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swn Y Coed, are necessary to ensure the RLDP is able to effectively meet
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Barratt Redrow welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Barratt Redrow support the requirements for affordable housing in new development. In its current form the proposed policies SP7 and SP8 lack sufficient flexibility for site specific circumstances and physical constraints which may impact upon delivery. This inevitably creates uncertainty for a number of sites, where the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities.
• From a planning perspective it is also important to recognise the additional benefits the site (Candidate Site Ref No. 437) could provide in accommodating the increased housing need generated by the suggested 15% flexibility allowance within a highly sustainable location. The principles of which clearly align with the Council's aspirations and would maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3ch

4402 Object

Document Element: Weycock Cross to Cardiff

Respondent: Mrs Helen Gill [2660]

Summary:

The area is already very congested and at times is akin to a car park. This would be a dangerous area to encourage cycling or walking unless drastic action to improve the road is taken. Small changes will not improve the safety or traffic flow. As the airport is increasing its flights and a college is being built the council has already ensured the road is over its natural capacity makes the whole area around Pontypridd road a misery for local residents. Rhoose and St Athens increases will create total gridlock & extreme frustration especially for school runs.

Full text:

The area is already very congested and at times is akin to a car park. This would be a dangerous area to encourage cycling or walking unless drastic action to improve the road is taken. Small changes will not improve the safety or traffic flow. As the airport is increasing its flights and a college is being built the council has already ensured the road is over its natural capacity makes the whole area around Pontypridd road a misery for local residents. Rhoose and St Athens increases will create total gridlock & extreme frustration especially for school runs.

Change suggested by respondent:

I don't agree with the plan to expand cycle and pedestrian routes around Port Road as it can be a dangerous road to travel along. The public transport is totally inadequate and this site is too far away from train stations. I also don't see any mention of elderly or disabled residents!

Sound: No

Attachments: None

4465 Object

Document Element: Barry to Dinas Powys.

Respondent: Mr Christopher Scutt [2798]

Summary:

This is a busy road at all times, to add addition houses along it route, in Dinas especially will cause significant delays. The road has a proposed cycle path which is not completed yet, I also feel that the cycle path will not be used by cyclists. Walking on this road is very dangerous at the best of times. All against the proposed strategy of alternative transport and against SSC1 section 9 ‘traffic’

Full text:

This is a busy road at all times, to add addition houses along it route, in Dinas especially will cause significant delays. The road has a proposed cycle path which is not completed yet, I also feel that the cycle path will not be used by cyclists. Walking on this road is very dangerous at the best of times. All against the proposed strategy of alternative transport and against SSC1 section 9 ‘traffic’

Change suggested by respondent:

Dinas Powys needs to have major improvement to the Barry/Cardiff road to allow, cycling, walking (especially to Barry.

The main road could be widened, and given it is now sinking, to the SW of DP, major restructure is needed sone, do this with a widening scheme first, then map the traffic flow (which was I previous reports at capacity) to see if housing can happen then, but only after the flow is improved or bypassed.

Dinas Powys needs to have reinstated the proposed By Pass to enable fluid links between Cardiff and Barry, avoiding the Dinas Powys Bottleneck.

Sound: No

Attachments: None

4466 Object

Document Element: Pen Y Turnpike/Leckwith Road
Respondent: Mr Christopher Scutt [2798]

Summary:

Pen Y Turnpike/Leckwith Junction is busy and as stated it avoids congested routes which could be considered major. To add traffic lights at an acute angled junction will be difficult and will back up and slow traffic, as a strategy to reduce use this is short sighted.

And again cycling up Pen Y Turnpike is hazardous and unless the proposal is to include new cycle lanes then it must only be stated for effect.

Full text:

Pen Y Turnpike/Leckwith Junction is busy and as stated it avoids congested routes which could be considered major. To add traffic lights at an acute angled junction will be difficult and will back up and slow traffic, as a strategy to reduce use this is short sighted.

And again cycling up Pen Y Turnpike is hazardous and unless the proposal is to include new cycle lanes then it must only be stated for effect.

Change suggested by respondent:

1. Reduce use of Pen y turn pike by improving flow on the main Cardiff road for commuters.
2. Improve cycling links that actually work on Pen y turnpike, where it is currently hazardous.
3. Widening of PYT is probably not possible, and adding a cycle lane is not going to happen, why state this at the Junction
4. With the addition of Key area HG1 KS2 and potentially sites 443/431/3838/369 This adds considerable loading.

Traffic flow needs to be improved, HG1 KS2 site adds another set of traffic lights, increasing use 250 houses, 250 plus cars potentially? forcing traffic back into DP, this will only lead to people using PYT as a shortcut increasing traffic.

To use Public transport use as a transport strategy going forward is short sighted unless flow is improved and car use is reduced, I see no sign this will change especially as people shift towards electric vehicles.

Sound: No
Attachments: None

4499 Support

Document Element: Weycock Cross to Cardiff
Respondent: Mr Simon Parker [2821]

Summary:

The road from Rhoose to Barry MUST have a payment and/or cycle lane. This should have been done years ago.

Full text:

The road from Rhoose to Barry MUST have a payment and/or cycle lane. This should have been done years ago.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

4663 Object

Document Element: St Athan Transport
Respondent: Mr Tim Griffiths [2578]

Summary:

With the refusal to facilitate a Railway station at St Athan puts increasing volumes of traffic on an already busy A4226

Full text:

With the refusal to facilitate a Railway station at St Athan puts increasing volumes of traffic on an already busy A4226

Change suggested by respondent:

Rethink the Railway Station at St Athan

Sound: No
Attachments: None

4678 Object

Document Element: Weycock Cross roundabout,

Respondent: Mr Tim Griffiths [2578]

Summary:

Changes to this roundabout will only make a scary roundabout into a more dangerous one

Full text:

Changes to this roundabout will only make a scary roundabout into a more dangerous one

Change suggested by respondent:

Keep it as it is

Sound: No

Attachments: None

4984 Object

Document Element: Weycock Cross roundabout,

Respondent: Emma Reed [2653]

Summary:

The Plan must show the improvements to be made, how they will be paid for and when they will happen and demonstrate the impact this will have on moving public transport quicker through the junction. Without this no development in Rhoose should occur the developments at Readers Way Model Farm and at the Airport will mean far more traffic will come via this junction as public transport facilities are totally inadequate.

Full text:

The Plan must show the improvements to be made, how they will be paid for and when they will happen and demonstrate the impact this will have on moving public transport quicker through the junction. Without this no development in Rhoose should occur the developments at Readers Way Model Farm and at the Airport will mean far more traffic will come via this junction as public transport facilities are totally inadequate.

Change suggested by respondent:

More detail to show that improvements at Weycock Cross Junction are deliverable and will be implemented before additional housing is allowed in Rhoose.

Sound: Yes

Attachments: None

5101 Support

Document Element: St Athan Transport

Respondent: Mr Tim Brown [3000]

Summary:

Delighted to see land safeguarded for a potential new train station/halt with parking. Having studied the plans, the intended land reserved for a station/halt is a perfect location and would be a godsend to St Athan. I'm old enough to remember the old Gilestone station being very busy with military personnel when RAF St Athan was in its heyday with some 2000 plus serving and civilian personnel. The St Athan population alone has now exceeded that so it's time to build a new rail facility.

Full text:

No objection to this development and delighted to see land safeguarded for a potential new train station/halt with parking. Having studied the plans, the intended land reserved for a station/halt is a perfect location and would be a godsend to St Athan. I'm old enough to remember the old Gilestone station being very busy with military personnel when RAF St Athan was in its heyday with some 2000 plus serving and civilian personnel. The St Athan population alone has now exceeded that so it's time to build a new rail facility.

Of course derelict buildings being cleared but I know of at least two military type FW3/22 pillboxes with a third on the road side near the airfield entrance gates. These were constructed in WW2 for the defence of the RAF airfield south side and I believe may be listed buildings. In any case, these should be preserved as historical features of interest with educational sign board attached or erected alongside. The southernmost one in the field appears to be of poured concrete construction and in visibly sound condition.

I did submit my concerns on the on-line portal but it was word limited and I wanted to expand on the matter.

I thank you and all the decision makers for your kind consideration.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Paper representation redacted - https://valeofglamorgan.oc2.uk/a/syd

5364 Comment

Document Element: Weycock Cross roundabout,

Respondent: Professor Andrew Vincent [920]

Summary:

The idea that a few 'lane marking modifications', 'extended approach lanes', and 'some signalization' will address the prospective increases in traffic is absurd. Housing growth in St. Athan, Llantwit Major, Rhoose, together with a growing Airport, potential industrial park traffic, will all feed extra traffic onto this route. This will not be addressed in these sticking-plastere proposals. Add to this the 700 plus cars (from the NW Barry development) trying to access Port Road immediately by the roundabout, and the overall outlook is disastrous.

Full text:

The idea that a few 'lane marking modifications', 'extended approach lanes', and 'some signalization' will address the prospective increases in traffic is absurd. Housing growth in St. Athan, Llantwit Major, Rhoose, together with a growing Airport, potential industrial park traffic, will all feed extra traffic onto this route. This will not be addressed in these sticking-plastere proposals. Add to this the 700 plus cars (from the NW Barry development) trying to access Port Road immediately by the roundabout, and the overall outlook is disastrous.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5374 Comment

Document Element: Weycock Cross to Cardiff

Respondent: Mrs Mary Vincent [2657]

Summary:

6.193 It is impossible to see how the development at North West Barry 'will deliver part of the 1.7-mile route, along the frontage of the site' without contributing to the already overloaded flow of traffic on the routes in and out of Barry. The measures suggested cannot possibly 'mitigate' the density of increased traffic this development will incur. That the options offered will improve the situation seems wishful thinking. The data collection appears thin and unsubstantiated. It appears the planners have cherry-picked data to at arrive at a conclusion already held in advance. We are not persuaded.

Full text:

6.193 It is impossible to see how the development at North West Barry 'will deliver part of the 1.7-mile route, along the frontage of the site' without contributing to the already overloaded flow of traffic on the routes in and out of Barry. The measures suggested cannot possibly 'mitigate' the density of increased traffic this development will incur. That the options offered will improve the situation seems wishful thinking. The data collection appears thin and unsubstantiated. It appears the planners have cherry-picked data to at arrive at a conclusion already held in advance. We are not persuaded.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5532 Support

Document Element: Sully to Cosmeston.

Respondent: Mrs Hilary May [2309]

Summary:

This will be particularly useful for Sully residents to access Penarth schools and services and link to Penarth train station. A route onwards to Barry through the docks should also be prioritised.

Full text:

This will be particularly useful for Sully residents to access Penarth schools and services and link to Penarth train station. A route onwards to Barry through the docks should also be prioritised.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5534 Support

Document Element: Weycock Cross to Cardiff

Respondent: Mrs Hilary May [2309]

Summary:

This is a route which will join up two existing shared use paths and has potential to be a valuable leisure and active travel route. Ebikes enable people to commute longer distances so it has the potential enable modal shift from car to cycle.

Full text:

This is a route which will join up two existing shared use paths and has potential to be a valuable leisure and active travel route. Ebikes enable people to commute longer distances so it has the potential enable modal shift from car to cycle.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5537 Support

Document Element: Cogan Transport Interchange.

Respondent: Mrs Hilary May [2309]

Summary:

This is particularly needed, in particular access to the station from Penarth Marina, Tesco and Pont y Werin which currently is unsafe and unappealing for those walking, wheeling and cycling. Access to the station needs to be improved as well. Safe cycle storage at the station and/or cycle hire would enable people to connect transport modes. Cogan station links well to Llandough hospital with an ecycle, but needs a safe route across the A4055 prioritised for cyclists, as well as better access off the station platform to Andrews Road.

Full text:

This is particularly needed, in particular access to the station from Penarth Marina, Tesco and Pont y Werin which currently is unsafe and unappealing for those walking, wheeling and cycling. Access to the station needs to be improved as well. Safe cycle storage at the station and/or cycle hire would enable people to connect transport modes. Cogan station links well to Llandough hospital with an ecycle, but needs a safe route across the A4055 prioritised for cyclists, as well as better access off the station platform to Andrews Road.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5632 Comment

Document Element: Weycock Cross to Cardiff

Respondent: Mrs Karine Dubois-Jones [3322]

Summary:

Current active travel routes are not suitable and hardly used by cyclists who use the raods instead for some reasons probably as the surface is dipped in areas and car users park on them as in Rhoose. Also sections are created in areas but the track is not continuous and then deter users as the main road is too dangerous for cycliste and families with children.Active routes should be created as in the Netherlands, they would be much better and safer!

Full text:

Current active travel routes are not suitable and hardly used by cyclists who use the raods instead for some reasons probably as the surface is dipped in areas and car users park on them as in Rhoose. Also sections are created in areas but the track is not continuous and then deter users as the main road is too dangerous for cycliste and families with children.Active routes should be created as in the Netherlands, they would be much better and safer!

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5661 Support

Document Element: Barry to Dinas Powys.

Respondent: Mr David Entwistle [3264]

Summary:

A pedestrian and cycling route will be a big improvement and allow both safer travel and recreational walking/cycling. As a user of these route in my area my main request is that they are more regularly cleaned by road sweeper and little pickers. When walking it's disappointing to see how much rubbish accumulates along routes and often after heavy rain and storms the amount of dropped branches and leaves can make cycling hazardous.

Full text:

A pedestrian and cycling route will be a big improvement and allow both safer travel and recreational walking/cycling. As a user of these route in my area my main request is that they are more regularly cleaned by road sweeper and little pickers. When walking it's disappointing to see how much rubbish accumulates along routes and often after heavy rain and storms the amount of dropped branches and leaves can make cycling hazardous.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5662 Support

Document Element: Sully to Cosmeston.

Respondent: Mr David Entwistle [3264]

Summary:

A pedestrian and cycling route will be a big improvement and allow both safer travel and recreational walking/cycling. As a user of these route in my area my main request is that they are more regularly cleaned by road sweeper and little pickers. When walking it's disappointing to see how much rubbish accumulates along routes and often after heavy rain and storms the amount of dropped branches and leaves can make cycling hazardous.

Full text:

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Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5663 Support

Document Element: Weycock Cross to Cardiff

Respondent: Mr David Entwistle [3264]

Summary:

A pedestrian and cycling route will be a big improvement and allow both safer travel and recreational walking/cycling. As a user of these routes in my area my main request is that they are more regularly cleaned by road sweeper and little pickers. When walking it's disappointing to see how much rubbish accumulates along routes and often after heavy rain and storms the amount of dropped branches and leaves can make cycling hazardous.

Full text:

A pedestrian and cycling route will be a big improvement and allow both safer travel and recreational walking/cycling. As a user of these routes in my area my main request is that they are more regularly cleaned by road sweeper and little pickers. When walking it's disappointing to see how much rubbish accumulates along routes and often after heavy rain and storms the amount of dropped branches and leaves can make cycling hazardous.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5665 Comment

Document Element: St Athan Transport

Respondent: Mr David Entwistle [3264]

Summary:

The interchange is a good start to improve public transport use but the frequency and expansion of bus and train services throughout the whole of the vale also needs to be addressed in order to encourage use and make it a practical alternative to private vehicle use. Simply building new interchanges and bus stops on its own is not enough.

Full text:

The interchange is a good start to improve public transport use but the frequency and expansion of bus and train services throughout the whole of the vale also needs to be addressed in order to encourage use and make it a practical alternative to private vehicle use. Simply building new interchanges and bus stops on its own is not enough.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5666 Comment

Document Element: Cogan Transport Interchange.

Respondent: Mr David Entwistle [3264]

Summary:

The interchange is a good start to improve public transport use but the frequency and expansion of bus and train services throughout the whole of the vale also needs to be addressed in order to encourage use and make it a practical alternative to private vehicle use. Simply building new interchanges and bus stops on its own is not enough.

Full text:

The interchange is a good start to improve public transport use but the frequency and expansion of bus and train services throughout the whole of the vale also needs to be addressed in order to encourage use and make it a practical alternative to private vehicle use. Simply building new interchanges and bus stops on its own is not enough.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5669 Comment

Document Element: Weycock Cross roundabout,

Respondent: Mr David Entwistle [3264]

Summary:

This roading improvement needs to be fast tracked and made a priority. At present the junction is well over capacity at many times of day. I support any improvements to this junction but I do feel that even with improvements the capacity of the road network here will still have constraints. Even with considerable improvements, from reading the transport modelling reports, it seems any additional housing development in the area will result in future, major, over capacity issues. I also fear the ratepayers will end up making oversized financial contributions relative to that from housing developers.

Full text:

This roading improvement needs to be fast tracked and made a priority. At present the junction is well over capacity at many times of day. I support any improvements to this junction but I do feel that even with improvements the capacity of the road network here will still have constraints. Even with considerable improvements, from reading the transport modelling reports, it seems any additional housing development in the area will result in future, major, over capacity issues. I also fear the ratepayers will end up making oversized financial contributions relative to that from housing developers.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5738 Comment

Document Element: Weycock Cross roundabout,

Respondent: Professor Andrew Vincent [920]

Summary:

The mitigation measures for Weycock roundabout are untested and the impact of a single entrance for the KS1 site, close to the congested Port Road, remains totally unresearched. Critical questions about traffic data collection—its timing, method, and representativeness—are unanswered. Persimmon's reliance on data from a single day in September 2023 raises significant questions about its validity or real utility. The same point holds for BP14 and BP14A. Despite extensive technical looking data, the timing and methods of data collection remain opaque, raising concerns about the seriousness, accuracy and reliability of the traffic assessments.

Full text:

HG1 KS1: Mitigation measures for Weycock roundabout – marginal widening and signalization - remain untested conjecture. Further, the sentence (BP14, 4.2.13): 'controlled crossings and access arrangements for Land at North West Barry', have been 'excluded.' and 'The access for Land at North West Barry and the impact on Waycock Cross Roundabout is to be considered ... between the land promoter and the Vale of Glamorgan Council' raise a core question. The core question is: what will be the effect of "one" entrance/exit for the KS1 site, that is 20 yards from the Weycock roundabout, with up to 700 plus potential cars traveling to and from work, schools, shops, etc edging directly onto a massively congested Port Road every weekday? A crucial dimension of the traffic dilemma is simply absent here in studies. In addition the question: "HOW" and "WHEN" was the traffic data collected? Neither BP14 or BP 14A provide ANY information here. Persimmon indicate in their document that "one" day in September 2023 provided the data. Can this really be taken seriously as anything more than an unrepresentative three year old snapshot? How did they collate data, what time of day did they collect it etc. All unanswered questions. However Persimmon build up 500+ pages of data on this thin example. I suspect the same holds for the data in BP14 and BP14A. It is an impressive fiction. Photos provide indication of normal traffic on Port Road and Pontypridd Road on the roundabout and immediately by the proposed entrance to the KS1 site as of March 2026

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Supporting information - photos - https://valeofglamorgan.oc2.uk/a/3pp

5744 Comment

Document Element: Weycock Cross roundabout,

Respondent: Mrs Mary Vincent [2657]

Summary:

Marginal widening of the roads entering Weycock roundabout the and signalisation will almost certainly not adequately address the gridlock that we already experience daily. The purported evidence of this document is flimsy guesswork. It does not take into account the effect of signalised junctions for cars and/or pedestrians and insufficient weight is given to the estimated traffic increases at each junction and the delays this will cause. We all know that the slightest hiccup in traffic flow (and there are many potential causes for this) can bring about disproportionate delays. It seems that no real allowance is made for the fact that this roundabout is a conduit for emergency vehicles to, from and between the airport, the town centre and other towns and villages along the coast.

We live with the existing traffic overload on a daily basis and it negatively impacts our lives. Additional housing with the extra ensuing traffic emptying onto the roundabout every morning and evening can only make this significently worse. If national planning policy states that development should not worsen traffic or pollution, then North West Barry site does not meet these standards. It should be withdrawn from the plan.

Full text:

Marginal widening of the roads entering Weycock roundabout the and signalisation will almost certainly not adequately address the gridlock that we already experience daily. The purported evidence of this document is flimsy guesswork. It does not take into account the effect of signalised junctions for cars and/or pedestrians and insufficient weight is given to the estimated traffic increases at each junction and the delays this will cause. We all know that the slightest hiccup in traffic flow (and there are many potential causes for this) can bring about disproportionate delays. It seems that no real allowance is made for the fact that this roundabout is a conduit for emergency vehicles to, from and between the airport, the town centre and other towns and villages along the coast.

We live with the existing traffic overload on a daily basis and it negatively impacts our lives. Additional housing with the extra ensuing traffic emptying onto the roundabout every morning and evening can only make this significently worse. If national planning policy states that development should not worsen traffic or pollution, then North West Barry site does not meet these standards. It should be withdrawn from the plan.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5800 Comment

Document Element: Weycock Cross roundabout,

Respondent: Mrs Catherine Hart [879]

Summary:

Transport from Weycock Cross to Cardiff Airport is certainly an issue, but more of an issue is the increased amount of traffic through Weycock Cross from the inreased housing at St Athan, the new Technical College, the airport and the industrial site at Model Farm should that go ahead. Emergency services will struggle.

Full text:

Transport from Weycock Cross to Cardiff Airport is certainly an issue, but more of an issue is the increased amount of traffic through Weycock Cross from the inreased housing at St Athan, the new Technical College, the airport and the industrial site at Model Farm should that go ahead. Emergency services will struggle.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5804 Comment

Document Element: Weycock Cross roundabout,

Respondent: Mrs Catherine Hart [879]

Summary:

There is no adequate provision for public transport, the addition of a separate lane on Pontypridd Road to feed on to Port Road to a traffic light junction with the Weycock Cross development is going to hold up already congested traffic.

Full text:

There is no adequate provision for public transport, the addition of a separate lane on Pontypridd Road to feed on to Port Road to a traffic light junction with the Weycock Cross development is going to hold up already congested traffic.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5855 Comment

Document Element: St Athan Transport

Respondent: Mr Jeff Smith [3399]

Summary:

Needs to be completed before the other developments in the area

Full text:

Needs to be completed before the other developments in the area

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5982 Comment

Document Element: Weycock Cross to Cardiff

Respondent: Emma Reed [2653]

Summary:

The active travel route is very expensive nad has land ownership problems between rhoose and barry. Can it really be implemented in the plan period?

Full text:

The bus routes for Rhoose need checking - there is only one proper bus an hour as a bus the 905 which travels a mile is hardly a proper bus route. The active travel route is very expensive nad has land ownership problems between rhoose and barry. Can it really be implemented in the plan period?

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5994 Comment

Document Element: Weycock Cross to Cardiff
Respondent: Councillor Samantha Campbell [1002]
Summary:
Further clarification is needed as to whether this land will be acquired through CPO and at what cost.

Full text:
Further clarification is needed as to whether this land will be acquired through CPO and at what cost.

Change suggested by respondent:
-

Sound: Not specified
Attachments: None

5995 Comment

Document Element: St Athan Transport
Respondent: Councillor Samantha Campbell [1002]
Summary:
TfW have already stated they will not be adding a train station in St Athan so what exactly is this in relation to? And how does it open the already poor public transport in the rural Vale to more links?

Full text:
TfW have already stated they will not be adding a train station in St Athan so what exactly is this in relation to? And how does it open the already poor public transport in the rural Vale to more links?

Change suggested by respondent:
-

Sound: Not specified
Attachments: None

6142 Comment

Document Element: Weycock Cross roundabout,
Respondent: Mrs Jacky Williams [3343]
Summary:
The housing and industrial proposals will cause a severe traffic problem that is already an issue. Currently, queues are frequently encountered approaching from the Five Mile Lane, Pontypridd Road and Port Road West from the Colcot roundabout to beyond the Dragon Tails roundabout.

The proposed addition of lanes approaching Weycock Cross will do nothing to increase flow around the roundabout and hence delays will only increase with increased amount of traffic. I would suggest that the roundabout should, regardless of predicted increase in traffic flow resulting from developments in Barry, Rhoose & St. Athan, be replaced with traffic lights.

Full text:
The housing and industrial proposals will cause a severe traffic problem that is already an issue. Currently, queues are frequently encountered approaching from the Five Mile Lane, Pontypridd Road and Port Road West from the Colcot roundabout to beyond the Dragon Tails roundabout.

The proposed addition of lanes approaching Weycock Cross will do nothing to increase flow around the roundabout and hence delays will only increase with increased amount of traffic. I would suggest that the roundabout should, regardless of predicted increase in traffic flow resulting from developments in Barry, Rhoose & St. Athan, be replaced with traffic lights.

Change suggested by respondent:
-

Sound: Not specified
Attachments: None

6289 Object

Document Element: Weycock Cross roundabout,

Respondent: Mr Steve Ashman [3161]

Summary:

The proposed changes to Weycock cross roundabout will not work because if you put traffic lights on port road to allow traffic out of the proposed development by the toby inn the amount of traffic coming from Rhoose would be a nightmare. If you lived around here you would know that you only have to have roadworks on port road coming from the airport and it's gridlocked for hours.

Full text:

I went to the consultation meeting in Rhoose yesterday. My questions are why is an access road being built to the bypass instead of sending the traffic through the village. Also no amenities are being provided as what happened with Rhoose point. There is also the problem with the college traffic plus more houses being built at Rhoose point and also the ongoing battle at Model farm. More houses are being built at Weycock cross adding to traffic congestion. The proposed changes to Weycock cross roundabout will not work because if you put traffic lights on port road to allow traffic out of the proposed development by the toby inn the amount of traffic coming from Rhoose would be a nightmare. If you lived around here you would know that you only have to have roadworks on port road coming from the airport and it's gridlocked for hours. There also is only one train and bus an hour so if you're trying to get cars off the roads these need to be increased.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/twh

6444 Comment

Document Element: St Athan Transport

Respondent: Mr Neil Jenkins [2729]

Summary:

Lack of Commitment to a Railway Station at St Athan
Despite decades of discussion, there is still no commitment from either Welsh Government or Transport for Wales—financial, strategic, or operational—to delivering a railway station at St Athan. No feasibility study, timetable, or land safeguarding exists. Yet the RLDP assumes that large-scale housing growth can be justified in the area. This assumption is not supported by evidence and locks the community into long-term car dependency. Even if a railway station at St Athan is developed in future years, it is highly likely the then ingrained dependence on car use will be extremely difficult to reverse.

Full text:

Lack of Commitment to a Railway Station at St Athan
Despite decades of discussion, there is still no commitment from either Welsh Government or Transport for Wales—financial, strategic, or operational—to delivering a railway station at St Athan. No feasibility study, timetable, or land safeguarding exists. Yet the RLDP assumes that large-scale housing growth can be justified in the area. This assumption is not supported by evidence and locks the community into long-term car dependency. Even if a railway station at St Athan is developed in future years, it is highly likely the then ingrained dependence on car use will be extremely difficult to reverse.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3gq

6583 Object

Document Element: St Athan Transport

Respondent: Councillor Stephen Haines [1029]

Summary:

The RLDP safeguards land for a "transport interchange" at St. Athan. However:
- There is no confirmed rail station.
- There is no confirmed funding package.
- There is no defined delivery programme.
- There are no binding occupation triggers linking housing delivery to transport delivery.

Previous references in planning documents referred to a railway station. The revised terminology of "transport interchange" reflects uncertainty.
Under Future Wales - The National Plan 2040, growth within the South East National Growth Area should align with sustainable transport infrastructure. Without guaranteed rail provision, development risks being car-dependent and inconsistent with decarbonisation objectives.

This raises concerns under the soundness test: Will the plan deliver?

Full text:

1. Section of Plan to which this Representation Relates
- Sustainable Growth Strategy
- Key Housing Sites:
KS4 - Land at Church Farm, St. Athan (532 dwellings) KS5 - Land to the West of St. Athan (600 dwellings)
- Housing Allocations: HG1(7)
Former Stadium Site, adjacent to Burley Place (80 dwellings)
HG1(8) - Clive Road, St. Athan (51 dwellings)
- Transport Policy (TR)
- Community Infrastructure Policy (CI)
- Policy SP13 - Infrastructure Provision
- Green Infrastructure Policies

2. Summary of Representation
This representation raises concerns regarding:
1. The scale of housing growth in St. Athan.
2. The absence of guaranteed sustainable transport infrastructure.
3. Insufficient retail and community infrastructure provision, particularly within the ward of Flemingston.
4. The allocation of the Clive Road site (HG1(8)), which currently functions as a de facto village green.
5. The cumulative infrastructure impact of candidate and legacy site allocations.
The representation seeks modifications to ensure the Plan is infrastructure-led, deliverable, and compliant with national planning policy and the Well-being of Future Generations (Wales) Act 2015.

3. Scale of Housing Growth in St. Athan
The RLDP allocates:
- KS4 - 532 dwellings
- KS5 - 600 dwellings
- HG1(7) - 80 dwellings
- HG1(8) - 51 dwellings
This equates to 1,263 dwellings in St. Athan.
This represents a very significant expansion of the settlement and must be assessed against:
- Existing infrastructure capacity
- Transport provision
- Education and healthcare availability
- Retail and service provision
At present, St. Athan does not have a rail station and relies heavily on private car travel.
The Plan must demonstrate clearly that this level of growth is proportionate and deliverable.

4. Transport Infrastructure and Deliverability
The RLDP safeguards land for a "transport interchange" at St. Athan. However:
- There is no confirmed rail station.
- There is no confirmed funding package.
- There is no defined delivery programme.
- There are no binding occupation triggers linking housing delivery to transport delivery.

Previous references in planning documents referred to a railway station. The revised terminology of "transport interchange" reflects uncertainty.

Under Future Wales - The National Plan 2040, growth within the South East National Growth Area should align with sustainable transport infrastructure. Without guaranteed rail provision, development risks being car-dependent and inconsistent with decarbonisation objectives.

This raises concerns under the soundness test: Will the plan deliver?

5. Retail and Local Service Provision - Flemingston Ward

The Deposit RLDP does not allocate new retail units or local service provision within the ward of Flemingston.
Given the scale of proposed housing growth across St. Athan and its surrounding areas, there is:

- No corresponding neighbourhood retail allocation.
- No clear commitment to small-scale convenience retail within walking distance of new development.
- No spatial recognition of Flemingston's service deficit.

This is inconsistent with Planning Policy Wales placemaking principles, which require:

- Mixed-use neighbourhoods.
- Walkable access to daily services.
- Reduced reliance on private vehicles.

Without provision of much-needed retail units within Flemingston ward, residents will remain dependent on car travel for everyday needs.
Modification is therefore sought to require neighbourhood retail and service provision proportionate to housing growth.

6. Clive Road Site (HG1(8)) - Community Function

The Clive Road site (HG1(8), 51 dwellings) currently functions as a de facto village green.
Although not formally designated, it is:
- Used informally for recreation.
- A visual open space within the settlement.
- A valued community amenity.
Its allocation for housing would result in:
- Loss of accessible informal open space.
- Erosion of community character.
- Reduction in green infrastructure connectivity.
The Plan should:
- Reassess the allocation in light of its community use; or
- Require equivalent or superior replacement open space within immediate proximity prior to development.
This matter engages Policy on Open Space and Green Infrastructure and must be considered in accordance with the prevention and long-term principles of the Well- being Act.

7. Candidate and Legacy Sites - Cumulative Impact Several allocations in St. Athan arise from:
- The Candidate Site process.
- Rolled-forward legacy allocations.
Individually, smaller sites may appear acceptable. However, cumulatively they produce substantial growth in a settlement with constrained infrastructure.
The Plan must demonstrate:
- Why these sites were preferred over alternatives.
- That lower growth options were robustly assessed.
- That greenfield loss is justified and mitigated.

8. Infrastructure and Phasing Concerns
Policy SP13 refers to securing infrastructure through planning obligations. However, reliance on financial contributions alone does not ensure timely delivery.

There is insufficient clarity regarding:
- Education capacity expansion.
- Primary healthcare provision.
- Highway mitigation triggers.
- Public transport enhancement sequencing.

Infrastructure must be delivered ahead of, or in tandem with, housing occupation - not retrospectively.

9. Compliance with the Five Ways of Working

Long-Term: Irreversible greenfield expansion without secured sustainable transport risks embedding long-term car dependency.
Prevention: Without infrastructure-first sequencing, congestion and service strain are foreseeable.
Integration: Housing growth appears to run ahead of confirmed transport and retail provision.
Collaboration: The Plan should demonstrate binding commitments from transport and infrastructure partners.
Involvement: Community concerns regarding scale and open space loss must be properly addressed.

10. Modifications Sought

To ensure soundness and compliance with national policy, the following modifications are requested:

1. Phasing Policy for KS4 and KS5
Introduce clear occupation thresholds tied to delivery of:
- Transport interchange infrastructure.
- Highway mitigation.Education capacity.
- Healthcare provision.

2. Retail Provision Requirement
Require neighbourhood retail and service provision within the ward of Flemingston proportionate to allocated and previous housing growth.

3. Clive Road Site Review (HG1(8))
Either:
- Remove the allocation; or
- Require replacement open space of equal or greater quality delivered prior to development.

4. Strengthened Infrastructure-First Wording
Amend Policy SP13 to make infrastructure delivery a pre-condition, not solely a contribution mechanism.

5. Monitoring Framework Enhancement Include specific indicators for:
- Sustainable transport modal share.
- Retail provision delivery.
- Open space replacement.
- Infrastructure phasing compliance.

11. Conclusion

St. Athan has a role within the wider Cardiff Capital Region and the South East National Growth Area. However, the current scale of housing allocation is not sufficiently matched by guaranteed infrastructure, retail provision, or community space protection.

Without modification, the Plan risks:
- Car-dependent growth,
- Loss of valued open space,
- Insufficient local retail provision,
- Pressure on community infrastructure.
This representation therefore seeks amendments to ensure that growth in St. Athan and Flemingston is proportionate, infrastructure-led, environmentally responsible, and compliant with Welsh planning policy.

Change suggested by respondent:
-

Sound: Not specified

Attachments:
Email Representation - https://valeofglamorgan.oc2.uk/a/3tk

6742 Support

Document Element: St Athan Transport
Respondent: Hallam Land Management [854]
Agent: Savills

Summary:
Hallam support the safeguarding of land for the St Athan Transport Interchange and see that its delivery would be to the benefit of the Key Site itself but also more broadly to St Athan and western parts of the VoG.

Full text:
1.1. Savills is instructed by Hallam Land ('Hallam') to respond to the consultation on the Deposit version of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').
1.2. Hallam is the strategic land arm of Henry Boot PLC and is one of the UK's most well established and successful land promoters. Hallam operates throughout England, Scotland and Wales from 7 regional offices working with landowners, developers, local authorities, communities and other parties to bring forward development opportunities. Hallam has been in operation since 1990, specialising in obtaining planning permission and delivering development larger schemes including new communities and urban extensions.
Background to Representations
1.3. The Preferred Strategy was published in November 2023. The Preferred Strategy identified "Land West of St Athan" and "Land South of the B4265, St Athan" (Site IDs 456 and 457) as one of five Key Sites in the Preferred Strategy. Both of

these sites are under the control of Hallam and were submitted as part of the Call for Sites. A site-specific illustrative masterplan and policy wording were provided under Policy SP4 KS5 (Land to the West of St Athan).
1.4. Hallam submitted representations on the consultation on the Preferred Strategy. These representations were very much supportive of the identification of "Land to the West of St Athan" as a Key Site and the approach that was taken more generally taken in the Preferred Strategy.
Approach to Responding to Consultation
1.5. The VoG has published the Deposit version of the RLDP. The Deposit is the first version of the RLDP to include emerging allocations, and detailed development management policies, as well as a Proposals Map. It is accompanied by a substantial evidence base which includes various supporting technical documentation submitted as part of the promotion of the allocated sites.
1.6. Building upon the Preferred Strategy, the Deposit RLDP proposes to allocate Land to the West of St Athan as a Key Site. The site is identified under Policy HG1 KS5 (Land to the West of St Athan) as key mixed-use site with capacity for 600 new homes alongside new community and commercial facilities.
1.7. Hallam's representation to this consultation broadly splits into three separate sections:
• It offers general support for the housing requirement, growth strategy and settlement hierarchy. This is covered in Chapter 2 of this Statement;
• It wholly supports the approach of allocating Land to the West of St Athan as part of the Deposit RLDP whilst also providing detailed commentary on the specific wording of Policy HG1 KS5 (Land to the West of St Athan). This is covered in Chapter 3 of this Statement; and
• It provides commentary on a range of development management policies. This is covered in Chapters 4, 5, 6, and 7 of this Statement.
1.8. As well as this Statement, Savills has provided commentary on these specific policies under the VoG's consultation website.

Policy SP1 (Sustainable Growth Strategy), Policy SP2 (Settlement Hierarchy), and Policy SP6 (Housing Requirement)
2.1. Together, these policies have the effect of:
• Setting the housing requirement to be delivered over the RLDP plan period of 7,890 homes with a flexibility allowance applied on top so that provision is made for a total of 8,660 homes. This is the same housing requirement to that included in the Preferred Strategy which was found by Welsh Government to be in conformity with Future Wales (Policies SP1 and SP6);
• Identifying the extent of the Strategic Growth Area as the primary focus of new housing growth. Concentrations of new housing are focussed in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity. St Athan is a specifically named settlement within the Strategic Growth Area (Policy SP1); and
• Identifying St Athan as a Primary Settlement in the third tier of the settlement hierarchy. This is the same tier of the settlement hierarchy as St Athan is in the adopted LDP (Policy SP2).
2.2. Hallam are generally supportive of the aims of these three policies.
2.3. They recognise that the housing requirement has been subject to extensive scrutiny and been found to be appropriate by Welsh Government in response to the Preferred Strategy. In that sense, there is nothing further for Hallam Land to comment upon here other than to note that it should reasonably be seen as the minimum number of homes that the RLDP should be aiming to deliver, particularly following the publication of the 2022-based household projections between Welsh Government's comments on the Preferred strategy and the publication of the Preferred Strategy.
2.4. The strategy – of focussing new housing in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity – is wholly supported. St Athan is clearly already a sustainable location for growth and its sustainability and connectivity have clear potential to enhance alongside further development. The delivery of growth in St Athan is therefore considered to firmly align with the RLDP's strategy.
2.5. The continued positioning of St Athan as a Primary Settlement in the third tier of the settlement hierarchy is considered appropriate though clearly the delivery of two Key Sites within St Athan as part of the RLDP has the potential to further elevate its position in the future. This is reflected in Table 10 of Background Paper 5 Settlement Appraisal Review where St Athan is given one of the higher scores of the Primary settlements.

Policy HG1 KS5 (Land to the West of St Athan)
3.1. Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.
3.2. There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.
3.3. The relevant policy for Land to the West of St Athan is Policy HG1 KS5.
3.4. As a starting point, Hallam wholeheartedly support the allocation of Land to the West of St Athan as a Key Site within the RLDP. Hallam made a comprehensive submission as part of the Call for Sites stage and since then have worked proactively with the VoG and other stakeholders to demonstrate that the site is suitable, deliverable, and viable. It's identification as a Key Site in the Deposit RLDP represents extensive and thorough assessment – its proposed

allocated is therefore considered to be sound and firmly evidence based.
3.5. So that the policy functions as effectively as possible, Hallam has a small number of comments and included at Appendix A is a re-worded version of Policy HG1 KS5 which incorporates those changes with text suggested to be removed crossed through and text to be added shown underlined.
3.6. These proposed adjustments are considered in turn below and are structured around the sub-headings that are contained within the policy wording itself.
Site Capacity and Housing Trajectory
3.7. Extensive environmental and technical work has been undertaken by Hallam to support the promotion of the site and the development of a masterplan (and site capacity) that responds to the site's constraints and opportunities.
3.8. That said, Hallam is not a housebuilder and once an outline planning application has progressed, Hallam will identify a development partner (which could be a single or multiple housebuilders / housing associations). Clearly different housebuilders have different house types and differing approaches to density.
3.9. In addition, whilst a lot of technical and environmental work has been undertaken to date, clearly further technical work would be submitted at planning application stage which would further validate the site's capacity.
3.10. Legislative and guidance changes also have the potential to impact a site capacity. Whilst the masterplanning process has been prepared to be SAB compliant, the impact of the introduction of the requirement to secure SAB approval has had an impact on site capacity and it follows that a further, and as yet unknown, legislative or guidance change could have a similar impact.
3.11. This is not to suggest that there isn't a high degree of confidence that the site can deliver roughly 600 homes, rather that Hallam suggest that the word 'approximately' is added to the policy wording to reflect the potential for a degree of deviation (which could be upwards or downwards).
3.12. Background Paper 9A Housing Land Supply and Housing Trajectory sets out the anticipated annual delivery rates for housing over the RLDP. With regards to the ability of the site to deliver the number of homes it is allocated for in the RLDP plan period, the housing trajectory for the site reflects that the first completion date was pushed back from 2027/2028 to 2028/2029 since the consultation on the Preferred Strategy. This means that the whole site continues to be shown as being delivered within the RLDP plan period.
3.13. Hallam support and agree with the approach set out in the Draft Housing Trajectory and see it to be realistic and achievable based on their experience and subject to usual caveats around the condition of the market, RLDP progression, and swift determination of a planning application.
Affordable Housing
3.14. At present, Policy HG1 KS5 (like all of the standalone policies for the other four Key Sites), states that the site should provide a minimum of 210 affordable housing units. This figure is derived from 35% of the number of homes that the site is allocated for (600 homes).
3.15. Worded at present, a strict interpretation of this policy could be that 210 affordable units must be provided onsite regardless of the total number of homes that are proposed. For example, it could be interpreted as requiring a fixed number of affordable homes of 210 homes, even if the total number of homes that are proposed on the site is fewer than the 600 homes that the site is allocated for or, conversely, that only 210 homes should be delivered as affordable if more than 600 homes were to be delivered and the RLDP allocation exceeded.
3.16. Hallam recognise that this is not what the policy wording is seeking to achieve (and their viability work for the site is based on the site delivering 600 homes of which 35% are affordable) but suggest that its wording could be clarified by removing reference to a specific number of affordable homes for the site to deliver in favour of just the affordable housing percentage being noted in the policy.
3.17. Hallam also suggest that the requirement for affordable housing units to not be in clusters of more than 10 homes is removed and that the approach is for this to be considered on a site by site and case by case basis and with recognition that Policy HG5 (Affordable Housing Exception Sites) which can provide a framework for 100% affordable sites of more than 10 homes to be delivered. As an example, and in the case of Land to the West of St Athan, the "Land South of the B4265, St Athan" (Site ID 457) portion of the site is likely better suited to a mixed-use development alongside the future St Athan Railway Sation. This portion of the site is probably better suited to a flatted form of development (either above non-residential uses or as a block) which tend to be delivered as 100% affordable housing developments rather than comprising a mix of private and affordable housing.
Sustainable Transport and Highways
3.18. This part of the policy sets out expectations relating to sustainable transport and highways and there are a number of matters which Hallam wish to comment on.
3.19. As a starting point, Hallam support the delivery of St Athan Railway Station and therefore commits to its safeguarding. Likewise, Hallam recognise the potential suitability for the "Land Between the Railway Line and B4265, St Athan" (Site ID 458) site to accommodate a Welsh-Medium Secondary School and can also therefore commit to safeguarding land for the delivery of a pedestrian and cycle bridge over the railway line. Specific comments on Policy TR1 (Transport Proposals) and Policy CI3 (New Community Facilities) are made elsewhere in this Statement.
3.20. With regards to the Sustainable Transport and Highways section of Policy HG1 KS5, Hallam's overall position is that a careful balance needs to be reached between the policy wording being explicit as to what highway works must be delivered and reserving consideration of this until planning application stage where the exact site capacity is better understood and a full Transport Assessment submitted.
3.21. At present, Hallam's view is that the policy wording is overly explicit and suggest that it could be qualified through the addition of the following text before listing the offsite highways improvements:
'Subject to the Strategic Transport Assessment and site-specific Transport Assessment submitted at planning application stage'.
3.22. Turning to the specific offsite highways measures that are listed within the policy wording, Hallam have four comments.

3.23. Firstly, it is suggested that the delivery of an active travel link along the B4265 between the site entrance and the Gileston Road junction should be secured via a financial contribution that is pooled with KS4 Church Farm. This reflects that the delivery of this link not only links Hallam's site to other services in St Athan but also linking KS4 Church Farm to the services that are proposed and uses for which land is safeguarded within Hallam's site. Clearly this is also to the benefit of existing residents of St Athan. This would reflect the approach that is proposed to be taking for the pooling of Section 106 monies for the delivery of an active travel route between St Athan and Llantwit Major.
3.24. Secondly, Hallam flag the need for the RLDP to be sufficiently flexible with regards to the delivery of an active travel link between St Athan and Llantwit Major. Ultimately, the purpose of delivering this active travel route would be to provide a connection from St Athan to Llantwit Major Railway Station and the delivery of a Railway Station in St Athan would remove the necessity of delivering this active travel connection. Hallam's suggested amendments to the policy wording seeks to reflect this.
3.25. Thirdly, Hallam have been consistent in highlighting that, whilst there is an aspiration to deliver an improved pedestrian link along Llantwit Road, a combination of the road width and the extent of third party ownerships make delivering a continuous link very challenging with a pragmatic approach instead needing to take place that recognises the ability to deliver betterments but acknowledges that delivering a continuous link is unlikely to be possible. Hallam has suggested additional wording to clarify this.
3.26. Fourthly, Hallam highlight that the designing of a loop road within the site to facilitate access by a bus may be superfluous and represent an over-engineered solution given the potential for the St Athan Transport Interchange that land is safeguarded for under Policy TR1 (Transport Proposals) is envisaged to accommodate infrastructure to accommodate a bus connection. On that basis, it is suggested that the following clause is added to the policy wording to reflect that bus connectivity to the site may be delivered not via an internal bus loop:
'Subject to progress on the St Athan Transport Interchange as land is safeguarded for under Policy TR1 (Transport Proposals)'
Community Infrastructure
3.27. There are three points which Hallam wish to make in connection to this element of Policy HG1 KS5.
3.28. Firstly, Hallam suggest that the wording of the part of the policy relating to financial contributions to fund the delivery of additional school places needs to be adjusted. At present this part of the policy is worded as if there is an automatic requirement to provide Section 106 monies for school places where Circular 13/97 is clear that a contribution should only be sought where the schools do not have current projected capacity to accommodate the new children from the development. Hallam's proposed adjustments seek to ensure that this part of the policy reflects this though note that Background Paper 43 Education forecasts a need for a financial contribution to be made for additional school places at all English and Welsh primary and secondary schools that the site is within the catchment of.
3.29. Secondly, Hallam note that Table 10 of Background Paper 34 Community Facilities identifies an existing over-provision of community space within the St Athan Ward of 778sqm and a surplus of 531sqm of community floorspace at 2036 when the level of housing to be allocated in the Deposit RLDP is delivered. It is understood that this is on the basis of no community floorspace being delivered as part of Hallam's proposals or as part of the KS4 Church Farm site. Hallam suggest that the wording of this element of the policy needs to reflect that community floorspace should only be required to be provided in the case of a local shortage in provision. Aligned to this, Hallam also suggest that the reference to specifically providing a 'community building' is adjusted to instead make reference to 'community space'. This reflects that the community space element of scheme, if indeed it is actually required, could be a part of a larger mixed-use building (probably in the Mixed-Use / Community area) rather than as a standalone building.
3.30. Thirdly, Hallam note the error in the wording of the sixth bullet point under the 'Sustainable Transport and Highways' heading where reference is made to the safeguarding of land on the southern side of the railway line as being identified in Policy CI3(2) where-as it should be Policy CI3(6). This is a minor amendment that should be made to ensure consistency.
Green Infrastructure, Recreation Spaces, and Biodiversity
3.31. The masterplan prepared by PAD Design and submitted by Hallam shows the site delivering a mix of public open space and green infrastructure including the provision of allotments, a Neighbourhood Equipped Area of Play, a Local Equipped Area of Play, and a sports pitch. This is welcomed in Background Paper 32A Green Infrastructure Assessment of Key Sites which, at Paragraph 5.55 recognises that a 'ground up' approach has been taken in the masterplanning approach.
3.32. This is shown indicatively to illustrate the composition of public open space and green infrastructure that the site could provide alongside the other elements of built development that the site is allocated and the masterplan makes provision for.
3.33. Whilst, Hallam recognise the need to provide public open space, the starting point for this should be the Fields In Trust Standards and Hallam therefore suggest an approach where the policy wording is not specific about what forms this should take.

Policy TR1 (Transport Proposals)
4.1. This policy identifies three active travel routes and two public transport schemes that the Deposit RLDP safeguards land for, as well as three highway improvement schemes that are identified as being required to mitigate the impact of development. Two of these are in St Athan – one being the St Athan Transport Interchange for which land is safeguarded for and the second being the Gileston Road Junction which is identified as a required highway improvement. Both are considered in turn below.
St Athan Transport Interchange
4.2. Hallam support the safeguarding of land for the St Athan Transport Interchange and see that its delivery would be to the benefit of the Key Site itself but also more broadly to St Athan and western parts of the VoG.
4.3. It is clear from discussions with Transport for Wales that there is a strong business case for the delivery of a railway

station and that the creation of “critical mass” through residential development around it has a key role in driving its delivery, as does the nationally significant economic role that the Bro Tathan Enterprise Zone has and the Aberthaw Green Energy Park will have. The proximity of St Athan to both of these hubs clearly contributes to its fundamental sustainability and suitability for growth whilst the further development of a critical mass of housing and employment generating uses will further support linkages between them and strengthen the business case for a new railway station at St Athan. This is reflected in TFW’s ‘Today, Tomorrow, Together: A Vision for Rail Across Wales and the Borders’ which confirms that the delivery of St Athan Railway Station remains in TFW’s pipeline which has been endorsed by the Westminster Government.
4.4. The location that is identified on the Proposals Map is Transport for Wales’ preferred location within the site and has been incorporated into the masterplanning approach which seeks to create a node around it by incorporating a bus interchange and a mix of uses.
4.5. At present, the Proposals Map identifies the location of the Railway Station using a red star which is positioned on the railway line itself but without the required land take not spatially being defined.
4.6. Whilst Hallam recognise that the exact land take required will need to be refined further through discussion with TFW, it may be the case that the mixed-use element on this portion of the site comes forward before the Railway Station.
4.7. The early delivery of these elements should be welcomed as clearly the mixed-use element both enhances the range of services and facilities in St Athan but also would mean that the Railway Station is integrated upon delivery.
4.8. On that basis, it is imperative that the safeguarding of land for the Transport Interchange is limited only to that land required to deliver the Transport Interchange and is done in such a way such the safeguarding does not sterilise non-transport related development from this portion of the site until the Railway Station has been delivered.
Gileston Road Junction, St Athan
4.9. Paragraphs 6.199 and 6.200 relate to the expectation that vehicle trips as a result of RLDP allocations in St Athan are anticipated to trigger the need to upgrade the Gileston Road Junction to a signal-controlled arrangement. This is informed by the conclusions of Table 3 of the Strategic Transport Assessment which forecasts that the junction will be operating above capacity during both the weekday AM and PM peak by the RLDP’s end point.
4.10. Hallam note that Technical Note 08 of the Strategic Transport Assessment identifies that the improvements to the Gileston Road Junction are to be delivered by VoG and funded through financial contributions from seven sites that the RLDP proposes to allocate.
4.11. Improvements to this junction are to be funded by a number of sites; however it is unclear whether (and if so, when) forward funding will be secured by the Council and clearly there cannot be a situation where none of the sites can deliver homes until strategic highways works are funded / completed. We therefore seek further clarification over the phasing of these works and note that early delivery of homes ahead of strategic highway improvements is likely to be important for deliverability of each strategic site.
4.12. To respond to Hallam’s above comments, one approach could be for references to highway improvement works to be entirely removed from this policy or, if they are to remain, that qualifying text is added to note that the need for and format of any improvements will be subject to detailed consideration at planning application stage and that such contributions must be justified in planning terms, particularly where (in the case of Pen Y Turnpike Road and Waycock Cross for Land to the West of St Athan), the distance from a site and the junction to be improved is significant and therefore thee number of vehicle trips that would be generated modest.
4.13. This aligns with Hallam’s suggested approach to the specific wording of Policy HG1 KS5.

Policy CI1 (Open Space Provision)
5.1. This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.
5.2. Hallam note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.
5.3. Hallam is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter.

Policy CI3 (New Community Facilities)
6.1. As well as allocating land for five new or improved education developments, this policy safeguards ‘Land South of the Railway Line, St Athan’ for the delivery of a Welsh-medium secondary school.
6.2. This policy is clearly of interest to Hallam because Paragraph 6.250 places a requirement for the safeguarding of land on the northern side of the railway line on their Land to the West of St Athan Key Site for a footbridge to land on.
6.3. With the policy wording being intentionally light-touch, Paragraph 6.250 of the Deposit RLDP provides greater detail about the safeguarding of this land (and other paragraphs in the Deposit RLDP relate to other community facilities that Policy CI3 covers). It effectively does two things.
6.4. Firstly, it notes that the delivery of this school will require active travel improvements including the safeguarding of land for a pedestrian and cyclist footbridge over the railway line.
6.5. Secondly, it is clear that the safeguarding of this land is in response to a forecast increase in demand for Welsh-medium secondary school places across the whole of the VoG as a result of expanded capacity at Welsh-medium primary schools across the VoG. On this basis, it follows that this location has been selected as a preferred location because of its ability to serve the wider sub-region.
6.6. Hallam recognise that this site could be a suitable location for a Welsh Medium Secondary School and, as a principle, is agreeable to the safeguarding of land for the footbridge landing on the northern side of the railway line.

6.7. Paragraph 6.250 of the Deposit RLDP is clear that the delivery of a Welsh-Medium secondary school is in response to a regional / sub-regional demand rather than a local need as a result generated either by the development of Land West of St Athan or other emerging allocations within St Athan and it cannot be the case that Hallam are expected to make disproportionate contributions to either the delivery of the school or required active travel improvements just because they have control of the site or that it is next to the Key Site.

Policy CC1 (Residential Operational Net Zero Carbon Development)
7.1. The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) before the policy wording sets out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.
7.2. As a starting point, Hallam share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) can present challenges. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this will result in an uneven framework for housebuilders, significantly adding cost and reducing certainty.
7.3. The justification for using planning policy to set requirements exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.
7.4. There are two points to be made by Hallam here:
7.5. Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage that such an approach would not be sound. This Written Ministerial Statement was subject to an unsuccessful judicial review.
7.6. Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations. Where there are existing Local Plans in England that take this approach, they do not align with the Westminster Government's position and there will be no Local Plans emerging including such policies.
7.7. Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs (Bridgend and Merthyr Tydfil) do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound at Examination stage.
7.8. Secondly, Hallam have concerns with the approach that has been taken with regards to viability.
7.9. From Hallam's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.
7.10. As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated. This is important as it demonstrates that, whilst Hallam do not believe such a policy approach should be taken, the development of the site at the time of the completion of the Development Viability Model for the site is viable whilst meeting the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development).
7.11. Hallam's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. This concern is particularly exacerbated by the fact that, as recognised at Paragraph 6.47 of Background Paper 42 Viability Assessment, takes the lowest estimate for the works required to achieve these policy expectations, Savills' experience – both that of their development land team based in Wales and their environmental sustainability team based across England - is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.
7.12. Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy DNP3 (Glamorgan Heritage Coast)
8.1. This policy relates to the Glamorgan Heritage Coast, identifying a series of land uses that are permissible within the policy area before setting three tests that must be satisfied for development within the Glamorgan Heritage Coast to be permissible where there is an adverse environmental impact.
8.2. Hallam note that the 'Land South of the B4265, St Athan' portion of the land that they control is both proposed to be retained as part of the Glamorgan Heritage Coast (a continuation of the position taken in the adopted LDP) whilst also forming part of the Land to the West of St Athan Key Site where the masterplan at Figure 17 shows it as accommodating the potential new railway station and a mixed-use area (including car parking).
8.3. The relevant extract of the Proposals Map is replicated below:

8.4. The exact composition of the buildings proposed on this portion will require further refinement and will need to be driven by occupier requirements, but the masterplanning work undertaken by pad Design envisages that they could provide a mix of retail and food and drink uses most likely across some or all of the ground floor, alongside workshop, co-working or office incubator space at upper floor levels and perhaps at ground floor level. There could also be the potential for additional homes, likely in the form of apartments at upper floors, as part of a mix of uses. It is realistic therefore to anticipate that this portion of the site will accommodate buildings of up to three or four storeys with a high plot ratio to reflect the uses and supporting infrastructure that it is to accommodate.
8.5. Hallam's position is that the continued inclusion of this parcel of land as part of the wider Glamorgan Heritage Coast is inappropriate for two reasons.
8.6. Firstly, and its most basic level, the approach of allocating the site for development whilst retaining a designation that inherently seeks to restrict the type, form, and quantum of development, is wholly contradictory.
8.7. Designation of this portion of the site as part of the Glamorgan Heritage Coast will mean, given that the uses that Figure 17 envisages as being delivered on the site are not those that the first part of Policy DNP3 (Glamorgan Heritage Coast) allows for, any application for development will need to demonstrate that there is a compelling need for the development, that the benefits outweigh the harm, and that appropriate mitigation measures are in place. This the potential to prejudice its development or, at very least, greatly impact how it is developed whilst requiring.
8.8. Secondly, it is difficult to see how this land warrants ongoing inclusion within the designated Glamorgan Heritage Coast. This is something that is considered in more detail in the Review of Landscape Character and Visual Amenity (December 2022) prepared by FPCR and submitted as part of the Call for Sites (and also available as part of the consultation on the Deposit RLDP as a piece of Key Site Supporting Information). Paragraph 5.13 of the FPCR document concludes on this piece of land that:
'Through the fieldwork it is considered that the Site does not display any "special environmental qualities" identified by the Policy and plays no intrinsic role in the Policy designation, as it is effectively forms a rather ordinary grazing field. It is influenced by the urbanising elements of the adjacent B4265, the Railway Line, the Tarmac Cement works, and to some degree the built edge of St Athan. Furthermore, it is bound and contained by trees and woodland beside the railway line, which prevents wider intervisibility with the coastline.'
8.9. Taking the above together, Hallam suggest that the preparation of the RLDP provides the opportunity to define the extent of the Glamorgan Heritage Coast to respond to both the landscape value of certain sites but also the wider aspirations of the RLDP. If it is not within the gift of VoG to redefine the boundaries of the Glamorgan Heritage Coast through the RLDP then Hallam suggest that an additional element could be added to this policy to confirm that it does not apply to land which is allocated for development.

Appendix A - rewording of Policy HG1 KS5

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3y3

6744 Comment

Document Element: St Athan Transport

Respondent: Hallam Land Management [854]

Agent: Savills

Summary:

Whilst Hallam recognise that the exact land take required will need to be refined further through discussion with TFW, it may be the case that the mixed-use element on this portion of the site comes forward before the Railway Station. The early delivery of these elements should be welcomed as clearly the mixed-use element both enhances the range of services and facilities in St Athan but also would mean that the Railway Station is integrated upon delivery. On that basis, it is imperative that the safeguarding of land for the Transport Interchange is limited only to that land required to deliver the Transport Interchange and is done in such a way such the safeguarding does not sterilise non-transport related development from this portion of the site until the Railway Station has been delivered.

Full text:

1.1. Savills is instructed by Hallam Land ('Hallam') to respond to the consultation on the Deposit version of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').
1.2. Hallam is the strategic land arm of Henry Boot PLC and is one of the UK's most well established and successful land promoters. Hallam operates throughout England, Scotland and Wales from 7 regional offices working with landowners, developers, local authorities, communities and other parties to bring forward development opportunities. Hallam has been in operation since 1990, specialising in obtaining planning permission and delivering development larger schemes including new communities and urban extensions.
Background to Representations
1.3. The Preferred Strategy was published in November 2023. The Preferred Strategy identified "Land West of St Athan" and "Land South of the B4265, St Athan" (Site IDs 456 and 457) as one of five Key Sites in the Preferred Strategy. Both of these sites are under the control of Hallam and were submitted as part of the Call for Sites. A site-specific illustrative masterplan and policy wording were provided under Policy SP4 KS5 (Land to the West of St Athan).

1.4. Hallam submitted representations on the consultation on the Preferred Strategy. These representations were very much supportive of the identification of "Land to the West of St Athan" as a Key Site and the approach that was taken more generally taken in the Preferred Strategy.
Approach to Responding to Consultation
1.5. The VoG has published the Deposit version of the RLDP. The Deposit is the first version of the RLDP to include emerging allocations, and detailed development management policies, as well as a Proposals Map. It is accompanied by a substantial evidence base which includes various supporting technical documentation submitted as part of the promotion of the allocated sites.
1.6. Building upon the Preferred Strategy, the Deposit RLDP proposes to allocate Land to the West of St Athan as a Key Site. The site is identified under Policy HG1 KS5 (Land to the West of St Athan) as key mixed-use site with capacity for 600 new homes alongside new community and commercial facilities.
1.7. Hallam's representation to this consultation broadly splits into three separate sections:
• It offers general support for the housing requirement, growth strategy and settlement hierarchy. This is covered in Chapter 2 of this Statement;
• It wholly supports the approach of allocating Land to the West of St Athan as part of the Deposit RLDP whilst also providing detailed commentary on the specific wording of Policy HG1 KS5 (Land to the West of St Athan). This is covered in Chapter 3 of this Statement; and
• It provides commentary on a range of development management policies. This is covered in Chapters 4, 5, 6, and 7 of this Statement.
1.8. As well as this Statement, Savills has provided commentary on these specific policies under the VoG's consultation website.

Policy SP1 (Sustainable Growth Strategy), Policy SP2 (Settlement Hierarchy), and Policy SP6 (Housing Requirement)
2.1. Together, these policies have the effect of:
• Setting the housing requirement to be delivered over the RLDP plan period of 7,890 homes with a flexibility allowance applied on top so that provision is made for a total of 8,660 homes. This is the same housing requirement to that included in the Preferred Strategy which was found by Welsh Government to be in conformity with Future Wales (Policies SP1 and SP6);
• Identifying the extent of the Strategic Growth Area as the primary focus of new housing growth. Concentrations of new housing are focussed in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity. St Athan is a specifically named settlement within the Strategic Growth Area (Policy SP1); and
• Identifying St Athan as a Primary Settlement in the third tier of the settlement hierarchy. This is the same tier of the settlement hierarchy as St Athan is in the adopted LDP (Policy SP2).
2.2. Hallam are generally supportive of the aims of these three policies.
2.3. They recognise that the housing requirement has been subject to extensive scrutiny and been found to be appropriate by Welsh Government in response to the Preferred Strategy. In that sense, there is nothing further for Hallam Land to comment upon here other than to note that it should reasonably be seen as the minimum number of homes that the RLDP should be aiming to deliver, particularly following the publication of the 2022-based household projections between Welsh Government's comments on the Preferred strategy and the publication of the Preferred Strategy.
2.4. The strategy – of focussing new housing in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity – is wholly supported. St Athan is clearly already a sustainable location for growth and its sustainability and connectivity have clear potential to enhance alongside further development. The delivery of growth in St Athan is therefore considered to firmly align with the RLDP's strategy.
2.5. The continued positioning of St Athan as a Primary Settlement in the third tier of the settlement hierarchy is considered appropriate though clearly the delivery of two Key Sites within St Athan as part of the RLDP has the potential to further elevate its position in the future. This is reflected in Table 10 of Background Paper 5 Settlement Appraisal Review where St Athan is given one of the higher scores of the Primary settlements.

Policy HG1 KS5 (Land to the West of St Athan)
3.1. Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.
3.2. There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.
3.3. The relevant policy for Land to the West of St Athan is Policy HG1 KS5.
3.4. As a starting point, Hallam wholeheartedly support the allocation of Land to the West of St Athan as a Key Site within the RLDP. Hallam made a comprehensive submission as part of the Call for Sites stage and since then have worked proactively with the VoG and other stakeholders to demonstrate that the site is suitable, deliverable, and viable. It's identification as a Key Site in the Deposit RLDP represents extensive and thorough assessment – its proposed allocated is therefore considered to be sound and firmly evidence based.
3.5. So that the policy functions as effectively as possible, Hallam has a small number of comments and included at

Appendix A is a re-worded version of Policy HG1 KS5 which incorporates those changes with text suggested to be removed crossed through and text to be added shown underlined.
3.6. These proposed adjustments are considered in turn below and are structured around the sub-headings that are contained within the policy wording itself.
Site Capacity and Housing Trajectory
3.7. Extensive environmental and technical work has been undertaken by Hallam to support the promotion of the site and the development of a masterplan (and site capacity) that responds to the site's constraints and opportunities.
3.8. That said, Hallam is not a housebuilder and once an outline planning application has progressed, Hallam will identify a development partner (which could be a single or multiple housebuilders / housing associations). Clearly different housebuilders have different house types and differing approaches to density.
3.9. In addition, whilst a lot of technical and environmental work has been undertaken to date, clearly further technical work would be submitted at planning application stage which would further validate the site's capacity.
3.10. Legislative and guidance changes also have the potential to impact a site capacity. Whilst the masterplanning process has been prepared to be SAB compliant, the impact of the introduction of the requirement to secure SAB approval has had an impact on site capacity and it follows that a further, and as yet unknown, legislative or guidance change could have a similar impact.
3.11. This is not to suggest that there isn't a high degree of confidence that the site can deliver roughly 600 homes, rather that Hallam suggest that the word 'approximately' is added to the policy wording to reflect the potential for a degree of deviation (which could be upwards or downwards).
3.12. Background Paper 9A Housing Land Supply and Housing Trajectory sets out the anticipated annual delivery rates for housing over the RLDP. With regards to the ability of the site to deliver the number of homes it is allocated for in the RLDP plan period, the housing trajectory for the site reflects that the first completion date was pushed back from 2027/2028 to 2028/2029 since the consultation on the Preferred Strategy. This means that the whole site continues to be shown as being delivered within the RLDP plan period.
3.13. Hallam support and agree with the approach set out in the Draft Housing Trajectory and see it to be realistic and achievable based on their experience and subject to usual caveats around the condition of the market, RLDP progression, and swift determination of a planning application.
Affordable Housing
3.14. At present, Policy HG1 KS5 (like all of the standalone policies for the other four Key Sites), states that the site should provide a minimum of 210 affordable housing units. This figure is derived from 35% of the number of homes that the site is allocated for (600 homes).
3.15. Worded at present, a strict interpretation of this policy could be that 210 affordable units must be provided onsite regardless of the total number of homes that are proposed. For example, it could be interpreted as requiring a fixed number of affordable homes of 210 homes, even if the total number of homes that are proposed on the site is fewer than the 600 homes that the site is allocated for or, conversely, that only 210 homes should be delivered as affordable if more than 600 homes were to be delivered and the RLDP allocation exceeded.
3.16. Hallam recognise that this is not what the policy wording is seeking to achieve (and their viability work for the site is based on the site delivering 600 homes of which 35% are affordable) but suggest that its wording could be clarified by removing reference to a specific number of affordable homes for the site to deliver in favour of just the affordable housing percentage being noted in the policy.
3.17. Hallam also suggest that the requirement for affordable housing units to not be in clusters of more than 10 homes is removed and that the approach is for this to be considered on a site by site and case by case basis and with recognition that Policy HG5 (Affordable Housing Exception Sites) which can provide a framework for 100% affordable sites of more than 10 homes to be delivered. As an example, and in the case of Land to the West of St Athan, the "Land South of the B4265, St Athan" (Site ID 457) portion of the site is likely better suited to a mixed-use development alongside the future St Athan Railway Sation. This portion of the site is probably better suited to a flatted form of development (either above non-residential uses or as a block) which tend to be delivered as 100% affordable housing developments rather than comprising a mix of private and affordable housing.
Sustainable Transport and Highways
3.18. This part of the policy sets out expectations relating to sustainable transport and highways and there are a number of matters which Hallam wish to comment on.
3.19. As a starting point, Hallam support the delivery of St Athan Railway Station and therefore commits to its safeguarding. Likewise, Hallam recognise the potential suitability for the "Land Between the Railway Line and B4265, St Athan" (Site ID 458) site to accommodate a Welsh-Medium Secondary School and can also therefore commit to safeguarding land for the delivery of a pedestrian and cycle bridge over the railway line. Specific comments on Policy TR1 (Transport Proposals) and Policy CI3 (New Community Facilities) are made elsewhere in this Statement.
3.20. With regards to the Sustainable Transport and Highways section of Policy HG1 KS5, Hallam's overall position is that a careful balance needs to be reached between the policy wording being explicit as to what highway works must be delivered and reserving consideration of this until planning application stage where the exact site capacity is better understood and a full Transport Assessment submitted.
3.21. At present, Hallam's view is that the policy wording is overly explicit and suggest that it could be qualified through the addition of the following text before listing the offsite highways improvements:
'Subject to the Strategic Transport Assessment and site-specific Transport Assessment submitted at planning application stage'.
3.22. Turning to the specific offsite highways measures that are listed within the policy wording, Hallam have four comments.
3.23. Firstly, it is suggested that the delivery of an active travel link along the B4265 between the site entrance and the Gileston Road junction should be secured via a financial contribution that is pooled with KS4 Church Farm. This reflects

that the delivery of this link not only links Hallam's site to other services in St Athan but also linking KS4 Church Farm to the services that are proposed and uses for which land is safeguarded within Hallam's site. Clearly this is also to the benefit of existing residents of St Athan. This would reflect the approach that is proposed to be taking for the pooling of Section 106 monies for the delivery of an active travel route between St Athan and Llantwit Major.
3.24. Secondly, Hallam flag the need for the RLDP to be sufficiently flexible with regards to the delivery of an active travel link between St Athan and Llantwit Major. Ultimately, the purpose of delivering this active travel route would be to provide a connection from St Athan to Llantwit Major Railway Station and the delivery of a Railway Station in St Athan would remove the necessity of delivering this active travel connection. Hallam's suggested amendments to the policy wording seeks to reflect this.
3.25. Thirdly, Hallam have been consistent in highlighting that, whilst there is an aspiration to deliver an improved pedestrian link along Llantwit Road, a combination of the road width and the extent of third party ownerships make delivering a continuous link very challenging with a pragmatic approach instead needing to take place that recognises the ability to deliver betterments but acknowledges that delivering a continuous link is unlikely to be possible. Hallam has suggested additional wording to clarify this.
3.26. Fourthly, Hallam highlight that the designing of a loop road within the site to facilitate access by a bus may be superfluous and represent an over-engineered solution given the potential for the St Athan Transport Interchange that land is safeguarded for under Policy TR1 (Transport Proposals) is envisaged to accommodate infrastructure to accommodate a bus connection. On that basis, it is suggested that the following clause is added to the policy wording to reflect that bus connectivity to the site may be delivered not via an internal bus loop:
'Subject to progress on the St Athan Transport Interchange as land is safeguarded for under Policy TR1 (Transport Proposals)'
Community Infrastructure
3.27. There are three points which Hallam wish to make in connection to this element of Policy HG1 KS5.
3.28. Firstly, Hallam suggest that the wording of the part of the policy relating to financial contributions to fund the delivery of additional school places needs to be adjusted. At present this part of the policy is worded as if there is an automatic requirement to provide Section 106 monies for school places where Circular 13/97 is clear that a contribution should only be sought where the schools do not have current projected capacity to accommodate the new children from the development. Hallam's proposed adjustments seek to ensure that this part of the policy reflects this though note that Background Paper 43 Education forecasts a need for a financial contribution to be made for additional school places at all English and Welsh primary and secondary schools that the site is within the catchment of.
3.29. Secondly, Hallam note that Table 10 of Background Paper 34 Community Facilities identifies an existing over-provision of community space within the St Athan Ward of 778sqm and a surplus of 531sqm of community floorspace at 2036 when the level of housing to be allocated in the Deposit RLDP is delivered. It is understood that this is on the basis of no community floorspace being delivered as part of Hallam's proposals or as part of the KS4 Church Farm site. Hallam suggest that the wording of this element of the policy needs to reflect that community floorspace should only be required to be provided in the case of a local shortage in provision. Aligned to this, Hallam also suggest that the reference to specifically providing a 'community building' is adjusted to instead make reference to 'community space'. This reflects that the community space element of scheme, if indeed it is actually required, could be a part of a larger mixed-use building (probably in the Mixed-Use / Community area) rather than as a standalone building.
3.30. Thirdly, Hallam note the error in the wording of the sixth bullet point under the 'Sustainable Transport and Highways' heading where reference is made to the safeguarding of land on the southern side of the railway line as being identified in Policy CI3(2) where-as it should be Policy CI3(6). This is a minor amendment that should be made to ensure consistency.
Green Infrastructure, Recreation Spaces, and Biodiversity
3.31. The masterplan prepared by PAD Design and submitted by Hallam shows the site delivering a mix of public open space and green infrastructure including the provision of allotments, a Neighbourhood Equipped Area of Play, a Local Equipped Area of Play, and a sports pitch. This is welcomed in Background Paper 32A Green Infrastructure Assessment of Key Sites which, at Paragraph 5.55 recognises that a 'ground up' approach has been taken in the masterplanning approach.
3.32. This is shown indicatively to illustrate the composition of public open space and green infrastructure that the site could provide alongside the other elements of built development that the site is allocated and the masterplan makes provision for.
3.33. Whilst, Hallam recognise the need to provide public open space, the starting point for this should be the Fields In Trust Standards and Hallam therefore suggest an approach where the policy wording is not specific about what forms this should take.

Policy TR1 (Transport Proposals)
4.1. This policy identifies three active travel routes and two public transport schemes that the Deposit RLDP safeguards land for, as well as three highway improvement schemes that are identified as being required to mitigate the impact of development. Two of these are in St Athan – one being the St Athan Transport Interchange for which land is safeguarded for and the second being the Gileston Road Junction which is identified as a required highway improvement. Both are considered in turn below.
St Athan Transport Interchange
4.2. Hallam support the safeguarding of land for the St Athan Transport Interchange and see that its delivery would be to the benefit of the Key Site itself but also more broadly to St Athan and western parts of the VoG.
4.3. It is clear from discussions with Transport for Wales that there is a strong business case for the delivery of a railway station and that the creation of "critical mass" through residential development around it has a key role in driving its delivery, as does the nationally significant economic role that the Bro Tathan Enterprise Zone has and the Aberthaw

Green Energy Park will have. The proximity of St Athan to both of these hubs clearly contributes to its fundamental sustainability and suitability for growth whilst the further development of a critical mass of housing and employment generating uses will further support linkages between them and strengthen the business case for a new railway station at St Athan. This is reflected in TFW's 'Today, Tomorrow, Together: A Vision for Rail Across Wales and the Borders' which confirms that the delivery of St Athan Railway Station remains in TFW's pipeline which has been endorsed by the Westminster Government.
4.4. The location that is identified on the Proposals Map is Transport for Wales' preferred location within the site and has been incorporated into the masterplanning approach which seeks to create a node around it by incorporating a bus interchange and a mix of uses.
4.5. At present, the Proposals Map identifies the location of the Railway Station using a red star which is positioned on the railway line itself but without the required land take not spatially being defined.
4.6. Whilst Hallam recognise that the exact land take required will need to be refined further through discussion with TFW, it may be the case that the mixed-use element on this portion of the site comes forward before the Railway Station.
4.7. The early delivery of these elements should be welcomed as clearly the mixed-use element both enhances the range of services and facilities in St Athan but also would mean that the Railway Station is integrated upon delivery.
4.8. On that basis, it is imperative that the safeguarding of land for the Transport Interchange is limited only to that land required to deliver the Transport Interchange and is done in such a way such the safeguarding does not sterilise non-transport related development from this portion of the site until the Railway Station has been delivered.
Gileston Road Junction, St Athan
4.9. Paragraphs 6.199 and 6.200 relate to the expectation that vehicle trips as a result of RLDP allocations in St Athan are anticipated to trigger the need to upgrade the Gileston Road Junction to a signal-controlled arrangement. This is informed by the conclusions of Table 3 of the Strategic Transport Assessment which forecasts that the junction will be operating above capacity during both the weekday AM and PM peak by the RLDP's end point.
4.10. Hallam note that Technical Note 08 of the Strategic Transport Assessment identifies that the improvements to the Gileston Road Junction are to be delivered by VoG and funded through financial contributions from seven sites that the RLDP proposes to allocate.
4.11. Improvements to this junction are to be funded by a number of sites; however it is unclear whether (and if so, when) forward funding will be secured by the Council and clearly there cannot be a situation where none of the sites can deliver homes until strategic highways works are funded / completed. We therefore seek further clarification over the phasing of these works and note that early delivery of homes ahead of strategic highway improvements is likely to be important for deliverability of each strategic site.
4.12. To respond to Hallam's above comments, one approach could be for references to highway improvement works to be entirely removed from this policy or, if they are to remain, that qualifying text is added to note that the need for and format of any improvements will be subject to detailed consideration at planning application stage and that such contributions must be justified in planning terms, particularly where (in the case of Pen Y Turnpike Road and Waycock Cross for Land to the West of St Athan), the distance from a site and the junction to be improved is significant and therefore thee number of vehicle trips that would be generated modest.
4.13. This aligns with Hallam's suggested approach to the specific wording of Policy HG1 KS5.

Policy CI1 (Open Space Provision)
5.1. This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.
5.2. Hallam note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.
5.3. Hallam is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter.

Policy CI3 (New Community Facilities)
6.1. As well as allocating land for five new or improved education developments, this policy safeguards 'Land South of the Railway Line, St Athan' for the delivery of a Welsh-medium secondary school.
6.2. This policy is clearly of interest to Hallam because Paragraph 6.250 places a requirement for the safeguarding of land on the northern side of the railway line on their Land to the West of St Athan Key Site for a footbridge to land on.
6.3. With the policy wording being intentionally light-touch, Paragraph 6.250 of the Deposit RLDP provides greater detail about the safeguarding of this land (and other paragraphs in the Deposit RLDP relate to other community facilities that Policy CI3 covers). It effectively does two things.
6.4. Firstly, it notes that the delivery of this school will require active travel improvements including the safeguarding of land for a pedestrian and cyclist footbridge over the railway line.
6.5. Secondly, it is clear that the safeguarding of this land is in response to a forecast increase in demand for Welsh-medium secondary school places across the whole of the VoG as a result of expanded capacity at Welsh-medium primary schools across the VoG. On this basis, it follows that this location has been selected as a preferred location because of its ability to serve the wider sub-region.
6.6. Hallam recognise that this site could be a suitable location for a Welsh Medium Secondary School and, as a principle, is agreeable to the safeguarding of land for the footbridge landing on the northern side of the railway line.
6.7. Paragraph 6.250 of the Deposit RLDP is clear that the delivery of a Welsh-Medium secondary school is in response to a regional / sub-regional demand rather than a local need as a result generated either by the development of Land

West of St Athan or other emerging allocations within St Athan and it cannot be the case that Hallam are expected to make disproportionate contributions to either the delivery of the school or required active travel improvements just because they have control of the site or that it is next to the Key Site.

Policy CC1 (Residential Operational Net Zero Carbon Development)
7.1. The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) before the policy wording sets out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.
7.2. As a starting point, Hallam share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) can present challenges. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this will result in an uneven framework for housebuilders, significantly adding cost and reducing certainty.
7.3. The justification for using planning policy to set requirements exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.
7.4. There are two points to be made by Hallam here:
7.5. Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage that such an approach would not be sound. This Written Ministerial Statement was subject to an unsuccessful judicial review.
7.6. Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations. Where there are existing Local Plans in England that take this approach, they do not align with the Westminster Government's position and there will be no Local Plans emerging including such policies.
7.7. Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs (Bridgend and Merthyr Tydfil) do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound at Examination stage.
7.8. Secondly, Hallam have concerns with the approach that has been taken with regards to viability.
7.9. From Hallam's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.
7.10. As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated. This is important as it demonstrates that, whilst Hallam do not believe such a policy approach should be taken, the development of the site at the time of the completion of the Development Viability Model for the site is viable whilst meeting the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development).
7.11. Hallam's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. This concern is particularly exacerbated by the fact that, as recognised at Paragraph 6.47 of Background Paper 42 Viability Assessment, takes the lowest estimate for the works required to achieve these policy expectations, Savills' experience – both that of their development land team based in Wales and their environmental sustainability team based across England - is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.
7.12. Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy DNP3 (Glamorgan Heritage Coast)
8.1. This policy relates to the Glamorgan Heritage Coast, identifying a series of land uses that are permissible within the policy area before setting three tests that must be satisfied for development within the Glamorgan Heritage Coast to be permissible where there is an adverse environmental impact.
8.2. Hallam note that the 'Land South of the B4265, St Athan' portion of the land that they control is both proposed to be retained as part of the Glamorgan Heritage Coast (a continuation of the position taken in the adopted LDP) whilst also forming part of the Land to the West of St Athan Key Site where the masterplan at Figure 17 shows it as accommodating the potential new railway station and a mixed-use area (including car parking).
8.3. The relevant extract of the Proposals Map is replicated below:
8.4. The exact composition of the buildings proposed on this portion will require further refinement and will need to be driven by occupier requirements, but the masterplanning work undertaken by pad Design envisages that they could

provide a mix of retail and food and drink uses most likely across some or all of the ground floor, alongside workshop, co-working or office incubator space at upper floor levels and perhaps at ground floor level. There could also be the potential for additional homes, likely in the form of apartments at upper floors, as part of a mix of uses. It is realistic therefore to anticipate that this portion of the site will accommodate buildings of up to three or four storeys with a high plot ratio to reflect the uses and supporting infrastructure that it is to accommodate.
8.5. Hallam's position is that the continued inclusion of this parcel of land as part of the wider Glamorgan Heritage Coast is inappropriate for two reasons.
8.6. Firstly, and its most basic level, the approach of allocating the site for development whilst retaining a designation that inherently seeks to restrict the type, form, and quantum of development, is wholly contradictory.
8.7. Designation of this portion of the site as part of the Glamorgan Heritage Coast will mean, given that the uses that Figure 17 envisages as being delivered on the site are not those that the first part of Policy DNP3 (Glamorgan Heritage Coast) allows for, any application for development will need to demonstrate that there is a compelling need for the development, that the benefits outweigh the harm, and that appropriate mitigation measures are in place. This the potential to prejudice its development or, at very least, greatly impact how it is developed whilst requiring.
8.8. Secondly, it is difficult to see how this land warrants ongoing inclusion within the designated Glamorgan Heritage Coast. This is something that is considered in more detail in the Review of Landscape Character and Visual Amenity (December 2022) prepared by FPCR and submitted as part of the Call for Sites (and also available as part of the consultation on the Deposit RLDP as a piece of Key Site Supporting Information). Paragraph 5.13 of the FPCR document concludes on this piece of land that:
'Through the fieldwork it is considered that the Site does not display any "special environmental qualities" identified by the Policy and plays no intrinsic role in the Policy designation, as it is effectively forms a rather ordinary grazing field. It is influenced by the urbanising elements of the adjacent B4265, the Railway Line, the Tarmac Cement works, and to some degree the built edge of St Athan. Furthermore, it is bound and contained by trees and woodland beside the railway line, which prevents wider intervisibility with the coastline.'
8.9. Taking the above together, Hallam suggest that the preparation of the RLDP provides the opportunity to define the extent of the Glamorgan Heritage Coast to respond to both the landscape value of certain sites but also the wider aspirations of the RLDP. If it is not within the gift of VoG to redefine the boundaries of the Glamorgan Heritage Coast through the RLDP then Hallam suggest that an additional element could be added to this policy to confirm that it does not apply to land which is allocated for development.

Appendix A - rewording of Policy HG1 KS5

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3y3

6745 Comment

Document Element: Gileston Road junction, St

Respondent: Hallam Land Management [854]

Agent: Savills

Summary:

Improvements to this junction are to be funded by a number of sites; however it is unclear whether (and if so, when) forward funding will be secured by the Council and clearly there cannot be a situation where none of the sites can deliver homes until strategic highways works are funded / completed. We therefore seek further clarification over the phasing of these works and note that early delivery of homes ahead of strategic highway improvements is likely to be important for deliverability of each strategic site.
To respond to Hallam's above comments, one approach could be for references to highway improvement works to be entirely removed from this policy or, if they are to remain, that qualifying text is added to note that the need for and format of any improvements will be subject to detailed consideration at planning application stage and that such contributions must be justified in planning terms.

Full text:

1.1. Savills is instructed by Hallam Land ('Hallam') to respond to the consultation on the Deposit version of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').
1.2. Hallam is the strategic land arm of Henry Boot PLC and is one of the UK's most well established and successful land promoters. Hallam operates throughout England, Scotland and Wales from 7 regional offices working with landowners, developers, local authorities, communities and other parties to bring forward development opportunities. Hallam has been in operation since 1990, specialising in obtaining planning permission and delivering development larger schemes including new communities and urban extensions.
Background to Representations
1.3. The Preferred Strategy was published in November 2023. The Preferred Strategy identified "Land West of St Athan" and "Land South of the B4265, St Athan" (Site IDs 456 and 457) as one of five Key Sites in the Preferred Strategy. Both of these sites are under the control of Hallam and were submitted as part of the Call for Sites. A site-specific illustrative masterplan and policy wording were provided under Policy SP4 KS5 (Land to the West of St Athan).

1.4. Hallam submitted representations on the consultation on the Preferred Strategy. These representations were very much supportive of the identification of "Land to the West of St Athan" as a Key Site and the approach that was taken more generally taken in the Preferred Strategy.
Approach to Responding to Consultation
1.5. The VoG has published the Deposit version of the RLDP. The Deposit is the first version of the RLDP to include emerging allocations, and detailed development management policies, as well as a Proposals Map. It is accompanied by a substantial evidence base which includes various supporting technical documentation submitted as part of the promotion of the allocated sites.
1.6. Building upon the Preferred Strategy, the Deposit RLDP proposes to allocate Land to the West of St Athan as a Key Site. The site is identified under Policy HG1 KS5 (Land to the West of St Athan) as key mixed-use site with capacity for 600 new homes alongside new community and commercial facilities.
1.7. Hallam's representation to this consultation broadly splits into three separate sections:
• It offers general support for the housing requirement, growth strategy and settlement hierarchy. This is covered in Chapter 2 of this Statement;
• It wholly supports the approach of allocating Land to the West of St Athan as part of the Deposit RLDP whilst also providing detailed commentary on the specific wording of Policy HG1 KS5 (Land to the West of St Athan). This is covered in Chapter 3 of this Statement; and
• It provides commentary on a range of development management policies. This is covered in Chapters 4, 5, 6, and 7 of this Statement.
1.8. As well as this Statement, Savills has provided commentary on these specific policies under the VoG's consultation website.

Policy SP1 (Sustainable Growth Strategy), Policy SP2 (Settlement Hierarchy), and Policy SP6 (Housing Requirement)
2.1. Together, these policies have the effect of:
• Setting the housing requirement to be delivered over the RLDP plan period of 7,890 homes with a flexibility allowance applied on top so that provision is made for a total of 8,660 homes. This is the same housing requirement to that included in the Preferred Strategy which was found by Welsh Government to be in conformity with Future Wales (Policies SP1 and SP6);
• Identifying the extent of the Strategic Growth Area as the primary focus of new housing growth. Concentrations of new housing are focussed in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity. St Athan is a specifically named settlement within the Strategic Growth Area (Policy SP1); and
• Identifying St Athan as a Primary Settlement in the third tier of the settlement hierarchy. This is the same tier of the settlement hierarchy as St Athan is in the adopted LDP (Policy SP2).
2.2. Hallam are generally supportive of the aims of these three policies.
2.3. They recognise that the housing requirement has been subject to extensive scrutiny and been found to be appropriate by Welsh Government in response to the Preferred Strategy. In that sense, there is nothing further for Hallam Land to comment upon here other than to note that it should reasonably be seen as the minimum number of homes that the RLDP should be aiming to deliver, particularly following the publication of the 2022-based household projections between Welsh Government's comments on the Preferred strategy and the publication of the Preferred Strategy.
2.4. The strategy – of focussing new housing in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity – is wholly supported. St Athan is clearly already a sustainable location for growth and its sustainability and connectivity have clear potential to enhance alongside further development. The delivery of growth in St Athan is therefore considered to firmly align with the RLDP's strategy.
2.5. The continued positioning of St Athan as a Primary Settlement in the third tier of the settlement hierarchy is considered appropriate though clearly the delivery of two Key Sites within St Athan as part of the RLDP has the potential to further elevate its position in the future. This is reflected in Table 10 of Background Paper 5 Settlement Appraisal Review where St Athan is given one of the higher scores of the Primary settlements.

Policy HG1 KS5 (Land to the West of St Athan)
3.1. Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.
3.2. There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.
3.3. The relevant policy for Land to the West of St Athan is Policy HG1 KS5.
3.4. As a starting point, Hallam wholeheartedly support the allocation of Land to the West of St Athan as a Key Site within the RLDP. Hallam made a comprehensive submission as part of the Call for Sites stage and since then have worked proactively with the VoG and other stakeholders to demonstrate that the site is suitable, deliverable, and viable. It's identification as a Key Site in the Deposit RLDP represents extensive and thorough assessment – its proposed allocated is therefore considered to be sound and firmly evidence based.
3.5. So that the policy functions as effectively as possible, Hallam has a small number of comments and included at

Appendix A is a re-worded version of Policy HG1 KS5 which incorporates those changes with text suggested to be removed crossed through and text to be added shown underlined.
3.6. These proposed adjustments are considered in turn below and are structured around the sub-headings that are contained within the policy wording itself.
Site Capacity and Housing Trajectory
3.7. Extensive environmental and technical work has been undertaken by Hallam to support the promotion of the site and the development of a masterplan (and site capacity) that responds to the site's constraints and opportunities.
3.8. That said, Hallam is not a housebuilder and once an outline planning application has progressed, Hallam will identify a development partner (which could be a single or multiple housebuilders / housing associations). Clearly different housebuilders have different house types and differing approaches to density.
3.9. In addition, whilst a lot of technical and environmental work has been undertaken to date, clearly further technical work would be submitted at planning application stage which would further validate the site's capacity.
3.10. Legislative and guidance changes also have the potential to impact a site capacity. Whilst the masterplanning process has been prepared to be SAB compliant, the impact of the introduction of the requirement to secure SAB approval has had an impact on site capacity and it follows that a further, and as yet unknown, legislative or guidance change could have a similar impact.
3.11. This is not to suggest that there isn't a high degree of confidence that the site can deliver roughly 600 homes, rather that Hallam suggest that the word 'approximately' is added to the policy wording to reflect the potential for a degree of deviation (which could be upwards or downwards).
3.12. Background Paper 9A Housing Land Supply and Housing Trajectory sets out the anticipated annual delivery rates for housing over the RLDP. With regards to the ability of the site to deliver the number of homes it is allocated for in the RLDP plan period, the housing trajectory for the site reflects that the first completion date was pushed back from 2027/2028 to 2028/2029 since the consultation on the Preferred Strategy. This means that the whole site continues to be shown as being delivered within the RLDP plan period.
3.13. Hallam support and agree with the approach set out in the Draft Housing Trajectory and see it to be realistic and achievable based on their experience and subject to usual caveats around the condition of the market, RLDP progression, and swift determination of a planning application.
Affordable Housing
3.14. At present, Policy HG1 KS5 (like all of the standalone policies for the other four Key Sites), states that the site should provide a minimum of 210 affordable housing units. This figure is derived from 35% of the number of homes that the site is allocated for (600 homes).
3.15. Worded at present, a strict interpretation of this policy could be that 210 affordable units must be provided onsite regardless of the total number of homes that are proposed. For example, it could be interpreted as requiring a fixed number of affordable homes of 210 homes, even if the total number of homes that are proposed on the site is fewer than the 600 homes that the site is allocated for or, conversely, that only 210 homes should be delivered as affordable if more than 600 homes were to be delivered and the RLDP allocation exceeded.
3.16. Hallam recognise that this is not what the policy wording is seeking to achieve (and their viability work for the site is based on the site delivering 600 homes of which 35% are affordable) but suggest that its wording could be clarified by removing reference to a specific number of affordable homes for the site to deliver in favour of just the affordable housing percentage being noted in the policy.
3.17. Hallam also suggest that the requirement for affordable housing units to not be in clusters of more than 10 homes is removed and that the approach is for this to be considered on a site by site and case by case basis and with recognition that Policy HG5 (Affordable Housing Exception Sites) which can provide a framework for 100% affordable sites of more than 10 homes to be delivered. As an example, and in the case of Land to the West of St Athan, the "Land South of the B4265, St Athan" (Site ID 457) portion of the site is likely better suited to a mixed-use development alongside the future St Athan Railway Sation. This portion of the site is probably better suited to a flatted form of development (either above non-residential uses or as a block) which tend to be delivered as 100% affordable housing developments rather than comprising a mix of private and affordable housing.
Sustainable Transport and Highways
3.18. This part of the policy sets out expectations relating to sustainable transport and highways and there are a number of matters which Hallam wish to comment on.
3.19. As a starting point, Hallam support the delivery of St Athan Railway Station and therefore commits to its safeguarding. Likewise, Hallam recognise the potential suitability for the "Land Between the Railway Line and B4265, St Athan" (Site ID 458) site to accommodate a Welsh-Medium Secondary School and can also therefore commit to safeguarding land for the delivery of a pedestrian and cycle bridge over the railway line. Specific comments on Policy TR1 (Transport Proposals) and Policy CI3 (New Community Facilities) are made elsewhere in this Statement.
3.20. With regards to the Sustainable Transport and Highways section of Policy HG1 KS5, Hallam's overall position is that a careful balance needs to be reached between the policy wording being explicit as to what highway works must be delivered and reserving consideration of this until planning application stage where the exact site capacity is better understood and a full Transport Assessment submitted.
3.21. At present, Hallam's view is that the policy wording is overly explicit and suggest that it could be qualified through the addition of the following text before listing the offsite highways improvements:
'Subject to the Strategic Transport Assessment and site-specific Transport Assessment submitted at planning application stage'.
3.22. Turning to the specific offsite highways measures that are listed within the policy wording, Hallam have four comments.
3.23. Firstly, it is suggested that the delivery of an active travel link along the B4265 between the site entrance and the Gileston Road junction should be secured via a financial contribution that is pooled with KS4 Church Farm. This reflects

that the delivery of this link not only links Hallam's site to other services in St Athan but also linking KS4 Church Farm to the services that are proposed and uses for which land is safeguarded within Hallam's site. Clearly this is also to the benefit of existing residents of St Athan. This would reflect the approach that is proposed to be taking for the pooling of Section 106 monies for the delivery of an active travel route between St Athan and Llantwit Major.
3.24. Secondly, Hallam flag the need for the RLDP to be sufficiently flexible with regards to the delivery of an active travel link between St Athan and Llantwit Major. Ultimately, the purpose of delivering this active travel route would be to provide a connection from St Athan to Llantwit Major Railway Station and the delivery of a Railway Station in St Athan would remove the necessity of delivering this active travel connection. Hallam's suggested amendments to the policy wording seeks to reflect this.
3.25. Thirdly, Hallam have been consistent in highlighting that, whilst there is an aspiration to deliver an improved pedestrian link along Llantwit Road, a combination of the road width and the extent of third party ownerships make delivering a continuous link very challenging with a pragmatic approach instead needing to take place that recognises the ability to deliver betterments but acknowledges that delivering a continuous link is unlikely to be possible. Hallam has suggested additional wording to clarify this.
3.26. Fourthly, Hallam highlight that the designing of a loop road within the site to facilitate access by a bus may be superfluous and represent an over-engineered solution given the potential for the St Athan Transport Interchange that land is safeguarded for under Policy TR1 (Transport Proposals) is envisaged to accommodate infrastructure to accommodate a bus connection. On that basis, it is suggested that the following clause is added to the policy wording to reflect that bus connectivity to the site may be delivered not via an internal bus loop:
'Subject to progress on the St Athan Transport Interchange as land is safeguarded for under Policy TR1 (Transport Proposals)'
Community Infrastructure
3.27. There are three points which Hallam wish to make in connection to this element of Policy HG1 KS5.
3.28. Firstly, Hallam suggest that the wording of the part of the policy relating to financial contributions to fund the delivery of additional school places needs to be adjusted. At present this part of the policy is worded as if there is an automatic requirement to provide Section 106 monies for school places where Circular 13/97 is clear that a contribution should only be sought where the schools do not have current projected capacity to accommodate the new children from the development. Hallam's proposed adjustments seek to ensure that this part of the policy reflects this though note that Background Paper 43 Education forecasts a need for a financial contribution to be made for additional school places at all English and Welsh primary and secondary schools that the site is within the catchment of.
3.29. Secondly, Hallam note that Table 10 of Background Paper 34 Community Facilities identifies an existing over-provision of community space within the St Athan Ward of 778sqm and a surplus of 531sqm of community floorspace at 2036 when the level of housing to be allocated in the Deposit RLDP is delivered. It is understood that this is on the basis of no community floorspace being delivered as part of Hallam's proposals or as part of the KS4 Church Farm site. Hallam suggest that the wording of this element of the policy needs to reflect that community floorspace should only be required to be provided in the case of a local shortage in provision. Aligned to this, Hallam also suggest that the reference to specifically providing a 'community building' is adjusted to instead make reference to 'community space'. This reflects that the community space element of scheme, if indeed it is actually required, could be a part of a larger mixed-use building (probably in the Mixed-Use / Community area) rather than as a standalone building.
3.30. Thirdly, Hallam note the error in the wording of the sixth bullet point under the 'Sustainable Transport and Highways' heading where reference is made to the safeguarding of land on the southern side of the railway line as being identified in Policy CI3(2) where-as it should be Policy CI3(6). This is a minor amendment that should be made to ensure consistency.
Green Infrastructure, Recreation Spaces, and Biodiversity
3.31. The masterplan prepared by PAD Design and submitted by Hallam shows the site delivering a mix of public open space and green infrastructure including the provision of allotments, a Neighbourhood Equipped Area of Play, a Local Equipped Area of Play, and a sports pitch. This is welcomed in Background Paper 32A Green Infrastructure Assessment of Key Sites which, at Paragraph 5.55 recognises that a 'ground up' approach has been taken in the masterplanning approach.
3.32. This is shown indicatively to illustrate the composition of public open space and green infrastructure that the site could provide alongside the other elements of built development that the site is allocated and the masterplan makes provision for.
3.33. Whilst, Hallam recognise the need to provide public open space, the starting point for this should be the Fields In Trust Standards and Hallam therefore suggest an approach where the policy wording is not specific about what forms this should take.

Policy TR1 (Transport Proposals)
4.1. This policy identifies three active travel routes and two public transport schemes that the Deposit RLDP safeguards land for, as well as three highway improvement schemes that are identified as being required to mitigate the impact of development. Two of these are in St Athan – one being the St Athan Transport Interchange for which land is safeguarded for and the second being the Gileston Road Junction which is identified as a required highway improvement. Both are considered in turn below.
St Athan Transport Interchange
4.2. Hallam support the safeguarding of land for the St Athan Transport Interchange and see that its delivery would be to the benefit of the Key Site itself but also more broadly to St Athan and western parts of the VoG.
4.3. It is clear from discussions with Transport for Wales that there is a strong business case for the delivery of a railway station and that the creation of "critical mass" through residential development around it has a key role in driving its delivery, as does the nationally significant economic role that the Bro Tathan Enterprise Zone has and the Aberthaw

Green Energy Park will have. The proximity of St Athan to both of these hubs clearly contributes to its fundamental sustainability and suitability for growth whilst the further development of a critical mass of housing and employment generating uses will further support linkages between them and strengthen the business case for a new railway station at St Athan. This is reflected in TFW's 'Today, Tomorrow, Together: A Vision for Rail Across Wales and the Borders' which confirms that the delivery of St Athan Railway Station remains in TFW's pipeline which has been endorsed by the Westminster Government.
4.4. The location that is identified on the Proposals Map is Transport for Wales' preferred location within the site and has been incorporated into the masterplanning approach which seeks to create a node around it by incorporating a bus interchange and a mix of uses.
4.5. At present, the Proposals Map identifies the location of the Railway Station using a red star which is positioned on the railway line itself but without the required land take not spatially being defined.
4.6. Whilst Hallam recognise that the exact land take required will need to be refined further through discussion with TFW, it may be the case that the mixed-use element on this portion of the site comes forward before the Railway Station.
4.7. The early delivery of these elements should be welcomed as clearly the mixed-use element both enhances the range of services and facilities in St Athan but also would mean that the Railway Station is integrated upon delivery.
4.8. On that basis, it is imperative that the safeguarding of land for the Transport Interchange is limited only to that land required to deliver the Transport Interchange and is done in such a way such the safeguarding does not sterilise non-transport related development from this portion of the site until the Railway Station has been delivered.
Gileston Road Junction, St Athan
4.9. Paragraphs 6.199 and 6.200 relate to the expectation that vehicle trips as a result of RLDP allocations in St Athan are anticipated to trigger the need to upgrade the Gileston Road Junction to a signal-controlled arrangement. This is informed by the conclusions of Table 3 of the Strategic Transport Assessment which forecasts that the junction will be operating above capacity during both the weekday AM and PM peak by the RLDP's end point.
4.10. Hallam note that Technical Note 08 of the Strategic Transport Assessment identifies that the improvements to the Gileston Road Junction are to be delivered by VoG and funded through financial contributions from seven sites that the RLDP proposes to allocate.
4.11. Improvements to this junction are to be funded by a number of sites; however it is unclear whether (and if so, when) forward funding will be secured by the Council and clearly there cannot be a situation where none of the sites can deliver homes until strategic highways works are funded / completed. We therefore seek further clarification over the phasing of these works and note that early delivery of homes ahead of strategic highway improvements is likely to be important for deliverability of each strategic site.
4.12. To respond to Hallam's above comments, one approach could be for references to highway improvement works to be entirely removed from this policy or, if they are to remain, that qualifying text is added to note that the need for and format of any improvements will be subject to detailed consideration at planning application stage and that such contributions must be justified in planning terms, particularly where (in the case of Pen Y Turnpike Road and Waycock Cross for Land to the West of St Athan), the distance from a site and the junction to be improved is significant and therefore thee number of vehicle trips that would be generated modest.
4.13. This aligns with Hallam's suggested approach to the specific wording of Policy HG1 KS5.

Policy CI1 (Open Space Provision)
5.1. This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.
5.2. Hallam note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.
5.3. Hallam is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter.

Policy CI3 (New Community Facilities)
6.1. As well as allocating land for five new or improved education developments, this policy safeguards 'Land South of the Railway Line, St Athan' for the delivery of a Welsh-medium secondary school.
6.2. This policy is clearly of interest to Hallam because Paragraph 6.250 places a requirement for the safeguarding of land on the northern side of the railway line on their Land to the West of St Athan Key Site for a footbridge to land on.
6.3. With the policy wording being intentionally light-touch, Paragraph 6.250 of the Deposit RLDP provides greater detail about the safeguarding of this land (and other paragraphs in the Deposit RLDP relate to other community facilities that Policy CI3 covers). It effectively does two things.
6.4. Firstly, it notes that the delivery of this school will require active travel improvements including the safeguarding of land for a pedestrian and cyclist footbridge over the railway line.
6.5. Secondly, it is clear that the safeguarding of this land is in response to a forecast increase in demand for Welsh-medium secondary school places across the whole of the VoG as a result of expanded capacity at Welsh-medium primary schools across the VoG. On this basis, it follows that this location has been selected as a preferred location because of its ability to serve the wider sub-region.
6.6. Hallam recognise that this site could be a suitable location for a Welsh Medium Secondary School and, as a principle, is agreeable to the safeguarding of land for the footbridge landing on the northern side of the railway line.
6.7. Paragraph 6.250 of the Deposit RLDP is clear that the delivery of a Welsh-Medium secondary school is in response to a regional / sub-regional demand rather than a local need as a result generated either by the development of Land

West of St Athan or other emerging allocations within St Athan and it cannot be the case that Hallam are expected to make disproportionate contributions to either the delivery of the school or required active travel improvements just because they have control of the site or that it is next to the Key Site.

Policy CC1 (Residential Operational Net Zero Carbon Development)
7.1. The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) before the policy wording sets out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.
7.2. As a starting point, Hallam share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) can present challenges. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this will result in an uneven framework for housebuilders, significantly adding cost and reducing certainty.
7.3. The justification for using planning policy to set requirements exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.
7.4. There are two points to be made by Hallam here:
7.5. Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage that such an approach would not be sound. This Written Ministerial Statement was subject to an unsuccessful judicial review.
7.6. Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations. Where there are existing Local Plans in England that take this approach, they do not align with the Westminster Government's position and there will be no Local Plans emerging including such policies.
7.7. Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs (Bridgend and Merthyr Tydfil) do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound at Examination stage.
7.8. Secondly, Hallam have concerns with the approach that has been taken with regards to viability.
7.9. From Hallam's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.
7.10. As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated. This is important as it demonstrates that, whilst Hallam do not believe such a policy approach should be taken, the development of the site at the time of the completion of the Development Viability Model for the site is viable whilst meeting the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development).
7.11. Hallam's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. This concern is particularly exacerbated by the fact that, as recognised at Paragraph 6.47 of Background Paper 42 Viability Assessment, takes the lowest estimate for the works required to achieve these policy expectations, Savills' experience – both that of their development land team based in Wales and their environmental sustainability team based across England - is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.
7.12. Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy DNP3 (Glamorgan Heritage Coast)
8.1. This policy relates to the Glamorgan Heritage Coast, identifying a series of land uses that are permissible within the policy area before setting three tests that must be satisfied for development within the Glamorgan Heritage Coast to be permissible where there is an adverse environmental impact.
8.2. Hallam note that the 'Land South of the B4265, St Athan' portion of the land that they control is both proposed to be retained as part of the Glamorgan Heritage Coast (a continuation of the position taken in the adopted LDP) whilst also forming part of the Land to the West of St Athan Key Site where the masterplan at Figure 17 shows it as accommodating the potential new railway station and a mixed-use area (including car parking).
8.3. The relevant extract of the Proposals Map is replicated below:
8.4. The exact composition of the buildings proposed on this portion will require further refinement and will need to be driven by occupier requirements, but the masterplanning work undertaken by pad Design envisages that they could

provide a mix of retail and food and drink uses most likely across some or all of the ground floor, alongside workshop, co-working or office incubator space at upper floor levels and perhaps at ground floor level. There could also be the potential for additional homes, likely in the form of apartments at upper floors, as part of a mix of uses. It is realistic therefore to anticipate that this portion of the site will accommodate buildings of up to three or four storeys with a high plot ratio to reflect the uses and supporting infrastructure that it is to accommodate.
8.5. Hallam's position is that the continued inclusion of this parcel of land as part of the wider Glamorgan Heritage Coast is inappropriate for two reasons.
8.6. Firstly, and its most basic level, the approach of allocating the site for development whilst retaining a designation that inherently seeks to restrict the type, form, and quantum of development, is wholly contradictory.
8.7. Designation of this portion of the site as part of the Glamorgan Heritage Coast will mean, given that the uses that Figure 17 envisages as being delivered on the site are not those that the first part of Policy DNP3 (Glamorgan Heritage Coast) allows for, any application for development will need to demonstrate that there is a compelling need for the development, that the benefits outweigh the harm, and that appropriate mitigation measures are in place. This the potential to prejudice its development or, at very least, greatly impact how it is developed whilst requiring.
8.8. Secondly, it is difficult to see how this land warrants ongoing inclusion within the designated Glamorgan Heritage Coast. This is something that is considered in more detail in the Review of Landscape Character and Visual Amenity (December 2022) prepared by FPCR and submitted as part of the Call for Sites (and also available as part of the consultation on the Deposit RLDP as a piece of Key Site Supporting Information). Paragraph 5.13 of the FPCR document concludes on this piece of land that:
'Through the fieldwork it is considered that the Site does not display any "special environmental qualities" identified by the Policy and plays no intrinsic role in the Policy designation, as it is effectively forms a rather ordinary grazing field. It is influenced by the urbanising elements of the adjacent B4265, the Railway Line, the Tarmac Cement works, and to some degree the built edge of St Athan. Furthermore, it is bound and contained by trees and woodland beside the railway line, which prevents wider intervisibility with the coastline.'
8.9. Taking the above together, Hallam suggest that the preparation of the RLDP provides the opportunity to define the extent of the Glamorgan Heritage Coast to respond to both the landscape value of certain sites but also the wider aspirations of the RLDP. If it is not within the gift of VoG to redefine the boundaries of the Glamorgan Heritage Coast through the RLDP then Hallam suggest that an additional element could be added to this policy to confirm that it does not apply to land which is allocated for development.

Appendix A - rewording of Policy HG1 KS5

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3y3

6785 Support

Document Element: Barry to Dinas Powys.

Respondent: Persimmon Homes (East Wales) [1068]

Agent: Boyer Planning

Summary:

Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements.

In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan

policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.

Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and

Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.
Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.
In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority. Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.

As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.

However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.

For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.

In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).

In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.

Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the

LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual
As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement
From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.
In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.
Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to

supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.
Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.
Policy SSC1 – Development within Settlement Boundaries
Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.
Policy SP4 – Placemaking
In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.
In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car.
Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.
The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.
Policy PGD1 – Creating Well Designed and Inclusive Places
Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.
On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with

the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed

access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
Loss of Allocated Employment Land
Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) &

2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.

According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.

On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.

Policy HG3 – Housing Led Redevelopment Opportunity

Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.

Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.

Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.

This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.

Policy SP7 – Affordable Housing Provision

In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.

As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.

National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.

To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.

Policy SP8 – Affordable Housing Requirements

Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.

On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.

Policy SP10 – Sustainable Transport

Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.

In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to

the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.

In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.

Policy TR1 – Transport Proposals

Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.

In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.

Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.

Policy SP13 – Community Infrastructure and Planning Obligations

Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.

Policy CI1 – Open Space Provision

Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.

The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.

Productive and Enterprising Places

Policy CC1 – Residential Operational Net Zero Carbon Development

Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.

Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.

Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.

The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the

proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.
Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.
Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.
Distinctive and Natural Places
Policy SP19 – Green Infrastructure
In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.
The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.
Policy SP20 – Biodiversity and Ecosystem Resilience
In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.
Policy DNP1 – Special Landscape Areas
Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.
Policy DNP2 – Green Wedges
Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.
Policy DNP8 – Severn Estuary Recreational Pressure
Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of

measurable impacts on the European site and thus the scope of mitigation that would subsequently be required. From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.

Conclusion

Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes' most pertinent comments on the consultation document are summarised below:

• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.

• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.

• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.

• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.

Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/38r

6850 Support

Document Element: Sully to Cosmeston.

Respondent: Taylor Wimpey [386]

Agent: Savills

Summary:
Taylor Wimpey support the designation of an active travel route connection the eastern side of Sully with Cosmeston in the north-east. Most notably the proposed route will pass Swanbridge Road which provides direct access to Land West of Swanbridge Road Site, with Phase 3 in close proximity to the travel route. The proposal would further enhance the accessibility and sustainability of the Site as a logical extension for residential development in Sully.

Full text:

1. Introduction

1.1.1 Savills is instructed by Taylor Wimpey PLC ('Taylor Wimpey') to respond to the consultation on the Deposit Plan as part of the preparation of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').

1.1.2 The submission is made in the context of Taylor Wimpey's position as the promoter of Site ID 376 (Land West of Swanbridge Road, Phase 3). The site is being promoted for a residential development comprising of 260 homes.

1.1.3 Taylor Wimpey is one of the UK's leading national housebuilders, with extensive experience in delivering high-quality residential developments across a wide range of local authority areas. The company has an established presence within the VoG area. Taylor Wimpey is in the process of delivering Phase 1 of the site with development of Phase 2 close to commencing to dovetail with the completion of Phase 1. Phase 3 would act as a logical extension to the site, effectively rounding off development in this part of Sully and dovetailing with Phase 2 which is anticipated to be completed in 2029.

1.1.4 The site was originally submitted as a candidate site as part of the Call for Candidate Sites stage in September 2022 by Taylor Wimpey. This was a comprehensive site submission demonstrating that the site was viable, deliverable and sustainable – the three tests for Candidate Sites to satisfy as set out in Paragraph 3.36 of the Development Plans Manual. The Candidate Site submission consisted of the following information:

• Archaeological Desk-based Assessment (prepared by RPS);
• Design Vision (prepared by Pegasus Group);
• Drainage Strategy & Flood Risk Assessment (prepared by Pheonix Design);
• Landscape Appraisal (prepared by Pegasus Group);
• Preliminary Ecological Appraisal (prepared by Soltys Brewster);
• High Level Viability Statement (prepared by Savills);
• Transport Technical Note (prepared by Vectos); and
• Supporting Statement (prepared by Savills).

1.1.5 Since then, and on behalf of Taylor Wimpey , Savills have also responded to the consultation on the Preferred Strategy in February 2024 as well as the Housing Growth in Barry consultation in July 2025 and the Housing Trajectory in October 2025.

1.1.6 This supporting statement is structured to initially comment on the approach taken by the VoG in assessing the Land West of Swanbridge Road, Phase 3 site before commenting on specific policies that are contained within the Deposit RLDP.

1.1.7 In general, Taylor Wimpey's position is that, at present, the Deposit RLDP is not sound but that it could be made sound through the amendments as suggested throughout this Statement.

2. Candidate Site Assessment Process and Integrated Sustainability Assessment
Introduction

2.1.1 Candidate sites are in essence assessed through two means – the Candidate Site Assessment Background Papers and the Integrated Sustainability Appraisal.

2.1.2 Taylor Wimpey's position is that both of these documents do not provide an adequate assessment of the Land West of Swanbridge Road, Phase 3 site.

2.1.3 Each is considered in turn below.

Candidate Site Assessment Process

2.1.4 All candidate sites have been assessed at Preferred Strategy stage (reported as Background Paper 18) and Deposit stage (reported as Background Paper 18a).

2.1.5 The reason for the Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site not being carried forward as part of these assessments was presented in Background Paper 18 at the time of publication of the Preferred Strategy with Backgropund Paper 18a providing no further site analysis. The reason for the site not progressing this stage of the Candidate Site assessment process is as follows:

"Development of the site would lead to a loss of the Best and Most Versatile Grade 3a agricultural land contrary to

national policy."

2.1.6 Whilst parts of the site do constitute Best and Most Versatile (BMV) land, Taylor Wimpey's position is that there are compelling reasons relating to the site's context and how it is utilised that mean a more nuanced position needs to be taken. Without such nuance, the RLDP risks not allocating a site that, whilst perhaps containing BMV, is otherwise suitable for development and more suitable for development then sites that the Deposit RLDP proposes to instead allocate.

2.1.7 Included at Appendix A, and included as part of Taylor Wimpey's representations on the Preferred Strategy and the Housing Growth in Barry consultations, is an Agricultural Assessment prepared by The Andersons Centre.

2.1.8 The key conclusions from this Assessment are that:

• The site is farmed by a tenant farmer whose main base is approximately 12km away which presents logistical and practical challenges. These challenges are exacerbated by the lack of farm buildings and the fact that there is no mains electricity;

• The site forms part of a wider 230 acre farm and so the cessation of agricultural practices on this parcel will not, by virtue of its size, prejudice the continued farming of the wider land parcel;

• The tenant farmer farms approximately 3,000 acres of land and so the loss of the ability to farm this parcel will have a negligible impact on the continuation of their agricultural operations;

• The site is bound on two sides by existing or permitted housing, on a third boundary by a railway line, and on its eastern boundary by a road; and

• Farming of the land does not support a high level of employment and if the land was lost for development, 0.15 of a full time labour unit's equivalent work would be lost.

2.1.9 Taking the above together, the conclusion needs to be reached that the site's size and context presents challenges for farming and that the development of Phase 2 by Taylor Wimpey has the potential to exacerbate these challenges. Aligned to this, the level of employment that the farming of the site supports is negligible and the cessation of farming of this particular parcel of land will not materially impact either the continued farming operations of the wider farm that the land sits apart of or the tenant farmer that farms the land.

Integrated Sustainability Appraisal

2.1.10 The Initial Integrated Sustainability Appraisal undertaken at Preferred Strategy stage provides a GIS based appraisal of all sites against 17 objectives. Inherently the Initial Integrated Sustainability Appraisal can be a bit of a blunt tool but Taylor Wimpey's position is that the site performs better against a substantial number of the 17 objectives than the current assessment.

2.1.11 Included at Appendix B is an assessment undertaken by Taylor Wimpey which provides commentary against certain objectives and suggests why the site performs considerably better than forecast in the Initial Integrated Sustainability Appraisal.

2.1.12 A summary of this is presented below:
Table 1 Summary of ISA and Suggested Taylor Wimpey Approach

2.1.13 Taylor Wimpey's position here is clear – the inadequacy of the Integrated Sustainability Appraisal as a tool for assessing candidate sites can only be appropriate where the Integrated Sustainability Appraisal is done correctly and considers the mitigation measures that a candidate site submission proposed to put in place. Without this, the Integrated Sustainability Appraisal risks a situation – as Taylor Wimpey suggest has been the case in Policy HG1 KS1 – where a Key Site is selected in favour of alternative sites that are better performing.

3. Deposit Plan

3.1 Introduction

3.1.1 The following section of this Statement comments on the relevant Key Themes, Strategic Objectives and draft Policy Framework forming part of the Deposit Plan Consultation.

3.1.2 The Policy Framework has been reviewed with comments provided on only those policies considered to be of most relevance to Land West of Swanbridge Road (Phase 3), Sully. The position on individual policies contained within the Deposit RLDP are summarised in the table below:

Table 2 Taylor Wimpey Policy Position

Relevant Policy Support or Object
SP1 Sustainable Growth Strategy - Object
SP2 Settlement Hierarchy - Support
SP 6 Housing Requirement - Object
HG1 Housing Allocations: HG1 KS1 – Land at North West Barry - Object
TR1 Transport Proposals: TR1(2) Active Travel Route Sully to Cosmeston - Support
TR1 Transport Proposals: TR1(6) Highway Improvement Works Weycock Cross Roundabout - Object
CC1 Residential Operational Net Zero Carbon Development - Object
CI1 Open Space Provision - Clarity required
DNP5 Environmental Protection - Object as currently worded

3.2 Key Themes and Strategic Objectives

Homes For All

3.2.1 As noted in paragraphs 3.17 and 3.18 of the Deposit Plan the VoG has the highest affordability ratio in Wales with average house prices 9.7 times the average workplace earnings compared to the Welsh average, giving rise to a significant need for affordable homes which is under significant pressure. This highlights the ever increasing need for sufficient high quality housing, which Taylor Wimpey are committed to provide and supply the mix, type and tenure of housing needed within the local authority's growing population.

Placemaking

3.2.2 Taylor Wimpey embed strong placemaking standards across their developments as detailed within their Placemaking Charter. Taylor Wimpey consider Land West of Swanbridge Road (Phase 3) to present an opportunity to provide a comprehensive residential development that is accessible and well-connected with the existing settlement of Sully and compliments the earlier phases of development. As demonstrated in the earlier phases of development, the Site offers a sustainable location for future growth with easy access to a range of services and facilities in Sully.

Protecting and Enhancing the Natural Environment

3.2.3 Taylor Wimpey support the VoG's commitment to protect and enhance the natural environment through the integration of green/blue infrastructure network and the sustainable management of resources within the VoG. However where Objective 5 seeks to safeguard land from inappropriate development, proposals must be subject to the relevant planning balance giving weight to the surrounding land use and appropriateness of safeguarding agricultural land that would otherwise be unconstrained and considered suitable for development given the outstanding need for housing.

Promoting Active and Sustainable Travel Choices

3.2.4 Taylor Wimpey support the promotion of sustainable travel and active modes of transport, including the provision of designated active travel routes that improve the connectivity between primary and key settlements, such as the Sully to Cosmeston active travel route.

3.2.5 As demonstrated in the earlier phases of Land West of Swanbridge Road, Taylor Wimpey support the promotion of active travel within new developments and provide opportunities for residents to easily engage with active travel.

3.3 Policy Framework

Policy SP1 Sustainable Growth Strategy

3.3.1 Taylor Wimpey's comments on this policy relate to the sustainable growth strategy in so much as it relates to the spatial strategy rather than the housing requirement that the RLDP adopts with further comments on the housing requirement provided in connection to Policy SP6 (Housing Requirement).

3.3.2 Taylor Wimpey appreciate the need to balance the ten strategic objectives against the need for growth and protection of the VoG's natural and built environment, and strongly support the strategic objective to provide homes for all. Taylor Wimpey maintain their position on the proposed growth strategy that has been established within earlier consultation responses submitted throughout the RLDP process, including the most recent consultation on 'Growth Options in Barry'.

3.3.3 Taylor Wimpey consider that to date the growth strategy has placed disproportionate emphasis on identifying an alternative site within Barry, rather than giving due consideration to potential sites in nearby high-performing settlements such as Sully. Taylor Wimpey therefore strongly encourage the VoG to widen the search for additional allocations beyond the administrative boundary of Barry Town Council and to consider locations that represent a logical and sustainable extension to neighbouring primary settlements that are located within the Strategic Growth Area, including Sully.

3.3.4 The six key elements of the Sustainable Growth Strategy are noted and Taylor Wimpey support a spatial strategy that locates major new development for the delivery of sustainable housing growth in appropriate locations, such as

Sully, that are supported by the relevant infrastructure, services and facilities. Providing new homes within Phase 3 aligns with the Strategic Growth Area identified within the RLDP Strategy which forms the primary focus for housing growth.

3.3.5 Policy SPG1 continues to identify Sully as a location where new housing development will be concentrated, therefore establishing a principle of development for Phase 3 and help to further align the provision of new housing with the existing facilities of Sully, reducing the need to travel. Sully represents an inherently sustainable location for future growth and aligns well with the Sustainable Transport Oriented Growth Option. As identified in the Deposit RLDP, Sully is classified as a Primary Settlement and performs a complementary role to Barry as a key centre. Its position within the Strategic Growth Area further indicates that an appropriate level of development at Sully would be acceptable, with both existing housing delivery and the current allocation at Swanbridge Road supporting its established role.
3.3.6 With existing development ongoing to the north of the Site, at Phases 1 and 2 of Land West of Swanbridge Road, Phase 3 is considered to provide an appropriate level of growth in a sustainable location that would form a logical extension to existing allocations. The sustainability and suitability of Sully to accommodate residential development is reinforced by the allocation of 500 dwellings under Policy MG2(37) ('Land West of Swanbridge Road, Sully') on land directly north of the site promoted by Taylor Wimpey. The progression of this location into a phase 3 development would continue to strengthen Sully's function as a primary settlement and would constitute a logical and coherent extension to the existing built form.

Figure 1 Extract of Growth Strategy

3.3.7 Taylor Wimpey appreciate the aspirations of the Council to deliver housing to meet the identified future housing needs of the VoG and wider growth aspirations of the South East Wales Region at a strategic level. Taylor Wimpey support the revised strategy moving away from North East Barry, however maintain the position that this level of growth should be re-allocated to those locations that are most suitable for growth, including sustainable settlements outside of Barry. Growth should not be focuses solely on Barry.

Policy SP2 Settlement Hierarchy

3.3.8 Taylor Wimpey support the conclusions of the Settlement Appraisal Review Background Paper which identifies Sully as a Primary Settlement, reflecting its important role in providing a level of housing growth, in addition to key local services and facilities. Within this Background Paper, Sully is recognised for its vital role as a sustainable community, scoring highly across all key principles in demonstrating its sustainability by providing for the day-to-day needs of its residents. Taylor Wimpey concur with the supporting evidence which reinforces Sully's importance within the settlement hierarchy.

3.3.9 Whilst Draft Policy SP2 presents a 'broad distribution of development within the Strategic Growth Area..', serious concerns continue to be raised around the level of growth around Barry and the emphasis placed on it as the focus for future development. Taylor Wimpey do not dispute the identification of Barry as a Key Settlement, given its position as the largest town within the VoG, however believe Barry should not remain the sole focus for growth where there are opportunities available around primary settlements located within the Strategic Growth Area.

3.3.10 Put another way, it seems perverse for the Deposit RLDP to direct no new growth to a Primary Settlement within the identified Strategic Growth Area.

Policy SP 6 Housing Requirement

3.3.11 The purpose of this policy is to set the housing requirement and then identify the components of supply that are anticipated to meet this housing requirement. A number of Background Papers (nos. BP7, BP8, BP8A, ad BP9A) underpin the approach that is taken. Taylor Wimpey have a number of comments to make on the approach taken in this policy.

Housing Requirement

3.3.12 The approach taken in the Deposit RLDP, as with the Preferred Strategy beforehand, is for the housing requirement to make use of a 10 year dwelling-led scenario, an approach that reflects past completions and looks to extrapolate this forward over the lifetime of the RLDP.

3.3.13 Taylor Wimpey provided detailed commentary on the proposed housing requirement in their comments on the Preferred Strategy but note that Welsh Government have subsequently provided their comments on the Preferred Strategy raising no objection with the housing requirement proposed to be taken.

3.3.14 Taylor Wimpey's position though remains – if a dwelling-led scenario is to be used to determine the housing requirement then it needs to have a far shorter scenario length then 10 years as the first three years of the 10 year period selected were when supply was suppressed as a result of the current LDP not having been adopted.

3.3.15 That said, there is a clear contextual change since the Preferred Strategy was adopted, this being the publication of the 2022-based household projections have been published. Table 5 of Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections provides a comparison of the 2022-based projections with the

2018-based projections and the Deposit RLDP's housing requirement. A simplified version of this table is shown overleaf:

Table 3 RLDP Housing Requirement
Scenario Housing Requirement
RLDP 7,587
2018-based projections 6,214
2022-based projections 9,623

3.3.16 This is important as Paragraph 4.2.6 of PWW states that:

'The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans.'

3.3.17 The proposed approach of continuing to use the 10 year dwelling-led scenario, as a methodology, clearly does not do this.

3.3.18 The approach of using the 2022-based household projections would comply with the aspirations of PPW. Taylor Wimpey's position is that the commentary provided in the Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections for not using 2022-based projections is wholly inadequate and that these projections should be used.

Flexibility Allowance

3.3.19 Paragraph 5.58 of Edition 3 the Development Plans Manual (March 2020) makes it clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes the RLDP should plan for. This is in the interest of ensuring that sufficient housing is delivered in the event of some allocated sites either not delivering in their entirety or delivering less homes than anticipated. Paragraph 5.59 of the Manual clarifies that the extent of the flexibility allowance should be informed by local issues with 10% as a starting point (i.e. as the minimum).

3.3.20 The Adopted Local Development Plan (ALDP) applies a 10% flexibility allowance on top of the housing requirement for 9,460 homes so that provision is made for 10,408 homes.

3.3.21 Paragraph 1.2.34 of the Annual Monitoring Report 2024-2025 provides a comparison of the number of homes that have been completed and the level of completions that the ALDP anticipates. This shows that 6,999 homes have been delivered up to 1st April 2025 against a cumulative dwelling target of 8,829 homes, representing a shortfall of 20.7%.

3.3.22 Taylor Wimpey's point here is that the ALDP's flexibility allowance of 10% is insufficient to ensure that the ALDP's housing requirement is actually being delivered. This is clear evidence that a higher flexibility allowance should be used for the RLDP. Although for different reasons, but following a direction from the Welsh Government Planning Inspector, Bridgend County Borough Council has increased its flexibility allowance to 20% and, it is considered that such a buffer is appropriate for the VoG's RLDP.

Non-Delivery Allowance on Land Bank

3.3.23 Line C of Table 2 of the Preferred Strategy relates to those sites that either benefit from planning permission or are subject to a resolution to grant planning permission subject to planning permission. Combined, these sites are identified as having capacity for 1,860 homes.

3.3.24 The current approach, which assumes that all other sites which are under construction or sites where there is either a planning permission in place or sites where there is a resolution to grant planning permission subject to the signing of a Section 106 agreement will be completed in full, causes concern for Taylor Wimpey.

3.3.25 There are multiple reasons why homes that benefit from either planning permission or a resolution to grant planning may not be delivered. These relate to viability, but also to specific site constraints and landowner intentions.

3.3.26 A point that is separate, but inherently linked, to the above is that often the capacity of a site for which reserved matters approval is sought is less than that permitted at outline stage. Requirements for SAB approval and the demonstration of a biodiversity net benefit, for example, reduce the capacity of a site at detailed design stage but are often not factored in at outline stage, particularly where the outline application is not progressed by a housebuilder.

3.3.27 Research undertaken by the Local Government Association for England (no such data is available for Wales) suggests that, between 2010/2011 and 2019/2020 a total of 2,782,300 dwelling were granted planning permission whilst there were only 1,627,730 completions. This means that during this period just 58.5% of those homes which were granted planning permission were completed.

3.3.28 Taylor Wimpey is not suggesting that applying a discount of 41.5% is necessarily correct and the above is both

from England and a few years out of date but the need for a discount that relates specifically to Line C is very clear.

3.3.29 It's difficult to know what this figure should be but Taylor Wimpey suggest that a 20% figure is used to reflect the flexibility allowance.

Windfall Allowances

3.3.30 The approach taken in the Deposit RLDP is to assume that 1,303 homes will be delivered across Windfall Sites. This has been calculated on the basis of previous completion delivered as windfalls.

3.3.31 Taylor Wimpey's concern is that the delivery of homes on Windfall Sites inherently becomes more challenging over time as the easier to develop sites have been delivered and the buildings and land that hasn't been developed is subject to increasing levels of policy protection. The approach taken by Cardiff Council in their Deposit RLDP is to assume that 75% of the 10 year average Windfall Sites will be delivered and such an approach seems entirely appropriate in this case.

3.3.32 An Urban Capacity Study (October 2023) prepared by the VoG, seeks to corroborate this by identifying 2,627 homes that could be delivered across the VoG. Whilst the windfall allowances would be less than the suggested urban capacity, this shouldn't be seen as problematic or as a conflict as the purpose of the Urban Capacity Study is, as the name suggests, just to identify sites which may have capacity. It doesn't account for land ownership (and whether the land owners have aspirations to dispose of the site) or development viability. In addition, the approach taken to site capacity to is to assume a density based on site type but it does this without an appreciation of site constraints and is based on the gross rather than net area.

Rolled Forward Sites

3.3.33 Taylor Wimpey have concerns with the approach that is taken in Table 2 of the Deposit RLDP which identifies allocations for 959 homes that are to be rolled over from the ALDP to the RLDP.

3.3.34 Concerns are raised around two sites in particular - Land to the west of Pencoedtre Lane, Barry and Land between new Northern Access Road and Eglwys Brewis Road, These sites are allocated in the ALDP but have failed to be delivered. Given the longstanding period during which there has been clear policy support for development but no completions, it follows that there are serious concerns around the deliverability of these two sites which, together, are allocated for 370 homes.

3.3.35 The failure to deliver these dwellings is due to a number of factors which are detailed in Taylor Wimpey's Preferred Strategy consultation response, which questions whether these sites will deliver at all or at a significantly reduced capacity due to the following reasons:

- Viability constraints;
- Site specific constraints;
- Landowner intentions;
- Requirements for SAB approval; and
- Biodiversity net benefit;

3.3.36 Whilst it is recognised that there may be policy support for the delivery of these two sites, there deliverability is clearly uncertain and they should be removed from Table 2.

Conclusion

3.3.37 The following table summarises the approach previously proposed in the Deposit RLDP and compares it to the amendments suggested by Taylor Wimpey in the preceding sections of this Statement.

Table 4 Deposit RLDP Housing Supply and Taylor Wimpey's Suggested Approach
Housing Supply - Deposit Plan (December 2025) - Taylor Wimpey Suggested Approach (March 2026)
Housing Requirement - 7,890 - 9,623
Flexibility Allowance - 10% - 20%
Flexibility Allowance – 770 - 1,925
Housing Requirement + Flexibility Allowance - 8,660 - 11,548
A – Completions - 1,747 - 1,747
B – Units Under Construction - 313 - 313
C and D- Units with Planning Permission Minus Non-Delivery Allowance - 1,777 1,488
Existing Supply - 3,827 - 3,548
E – Large Windfall Sites - 720 - 540
F – Small Windfall Sites - 583 - 438
E+ F Total Windfall Allowance - 1,303 - 978
RLDP Allocations - 3,520 - 3,150

3.3.38 The conclusion reached in Taylor Wimpey's analysis is that, as a result of both the suggested housing requirement and flexibility allowance combined with Taylor Wimpey's comments on the components of supply, the Deposit RLDP needs to find allocations to deliver a further 3,872 homes.

Policy HG1 KS1 – Land at North West Barry

3.3.39 Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. Taylor Wimpey has provided comments on the housing requirement that is set in the RLDP and the components of supply that are anticipated to meet it in the proceeding sections of this Statement.

3.3.40 As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.

3.3.41 There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.

3.3.42 Policy HG1 KS1 proposes to allocate the site known as 'Land at North West Barry'.

3.3.43 The proposed allocation of this site follows a consultation – entitled 'Housing Growth in Barry' - undertaken by the VoG in July 2025 which proposed to allocate three sites in Barry as an alternative to the North East Barry site that was identified as a Key Site in the Preferred Strategy but was considered to no longer be deliverable.

3.3.44 Taylor Wimpey responded as part of the 'Housing Growth in Barry' consultation, supporting the removal of North East Barry as a Key Site but raising serious concerns with the proposed allocation of 'Land at North West Barry' as an alternative.

3.3.45 These concerns remain and Taylor Wimpey strongly consider there need to be other alternative sites – such as Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) - within nearby settlements that perform better than the Land at North West Barry site and should be allocated for housing.

3.3.46 To support this conclusion, Taylor Wimpey has undertaken a review of the Integrated Sustainability Appraisal (ISA) which provides a scoring of different candidate sites against the 17 objectives as well as considering and comparing the sustainability and accessibility of the two sites.

Integrated Sustainability Appraisal

3.3.47 The below table provides a comparison of how the Integrated Sustainability Appraisal scores Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) compared to the Land at North West Barry site. Two different comparisons are provided – one which compares the actual scoring in the ISA and a second which compares the two sites following Taylor Wimpey's suggested scoring which is included as Appendix A.

3.3.48 These tables clearly highlight where the subject site out performs North West Barry across numerous objectives.

Table 5 Comparison of Phase 3 Land West of Swanbridge Road (Site ID 376) and North West Barry (Site ID 490) ISA performance

3.3.49 From an initial review, the Integrated Sustainability Appraisal shows that Land West of Swanbridge significantly outperforms North West Barry in terms of the number of significantly positive scores '++' and the number of '—' scores. To this end the subject site provides clear advantages above and beyond North West Barry in terms of homes, health, and transport. As such Land West of Swanbridge is considered to have the capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge; The site is within 800m of a health service and an active travel route; and, The site is within close proximity (≤800m) to a railway station or bus stop, town/ retail centre and an active travel route. Taylor Wimpey consider this assessment should go further to recognise the associated benefits to the leisure than be provided by the site's development.

3.3.50 Following Taylor Wimpey's re-assessment of the site against the Integrated Sustainability Appraisal ISA objectives it is also considered to obtain notably more positive '+' scores than North West Barry. It is also worth noting that North West Barry has more unknown impacts than Land West of Swanbridge which introduces a level of uncertainty around its potential for further negative impacts. Moreover, North West Barry scores a significant number of negative impacts across the ISA, with the extension site obtaining double the amount than Land West of Swanbridge Road.

3.3.51 Taylor Wimpey's position is that it would be unsound to allocate a site that performs considerably poorer in the Integrated Sustainability Appraisal than a site that is not proposed to be allocated.

Accessibility and Sustainability

3.3.52 SLR Consulting have prepared an updated document demonstrating the Site's sustainability credentials and providing a detailed overview of existing and future active travel and public transport infrastructure. This is included as Appendix C.

3.3.53 As a starting point, it considers those services within Sully. In terms of local amenities, the population size of Sully, naturally benefits from a good range of local amenities and services, and therefore it is anticipated that a high proportion of future residents' day-to-day journeys would be contained within the village and undertaken via walking or cycling. The Walking Catchment Map prepared by SLR demonstrates this and illustrates services within walking distance from the Site.

3.3.54 The proposed development benefits from local existing and future / planned infrastructure which will help support travel by sustainable modes such as walking, cycling and public transport. The Site falls within the less than 15 minutes Public Transport Catchment for bus and rail services. The Site is supported by the existing bus network, connecting Sully with Barry, Penarth and Cardiff – the nearest bus stop approximately 400m from the centre of the site; Moreover the Site is within proximity to Cadoxton and Penarth railway stations which have regular services in each direction in addition to the existing walking and cycling infrastructure in and around Sully.

3.3.55 The future accessibility of the Site will be further enhanced through the ongoing and planned South Wales Metro improvements, future active travel routes and the proposed Sully to Penarth mixed use link. The below figure shows several newly proposed active travel routes running close to the site including a new walking / cycling route along Swanbridge Road. Planning applications are now being submitted to support the delivery of these new active travel links. In March 2025 a planning application was submitted proposing a new route between Palmerstown and Dinas Powys.

3.4 SLR have undertaken further assessment work comparing the sustainability credentials of Land West of Swanbridge Road to Land North West of Barry. Land North West of Barry, is separated from the existing built-up area by the B4266 Pontypridd Road where the eastern and southern boundaries abut residential properties. As such, the proposed access for all modes would be taken from the A4226 Port Road West. The A4226 and B4266 can be a barrier to the promotion of active travel in that they facilitate vehicular travel and do not provide an attractive environment for pedestrians.

3.5 Furthermore, Land North West of Barry is on the fringes of Barry and had few if any facilities within a 10 minute walk, other than bus stops. In comparison, Land West of Swanbridge Road in Sully benefits from its proximity to the High Street in Sully and the services there.

3.6 The below table demonstrates differences in accessibility to amenities between the two sites, where Land West of Swanbridge Road presents a more favourable location for future development.

Table 6 Comparison of Local Facilities Between Land North West of Barry (Site ID 449) and Land West of Swanbridge Road (Phase 3) (Site ID 376)

3.7 Whilst the walking distance shown from Land North West of Barry to the nearest bus stop is slightly less than the Swanbridge Road Site, it should be noted that the bus services that can be accessed from Sully are more frequent and more direct than those which can be accessed from Land North West of Barry.

Conclusion

3.8 Taking the above together, the conclusion Taylor Wimepy reach is that their Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site performs more strongly than the Land North West of Barry site.

Policy TR1 Transport Proposals

3.9 The draft transport proposals contained within the Deposit RLDP have been reviewed with the following proposals considered to be pertinent to the Site and draft residential allocations.

TR 1 (2) Active Travel Route: Sully to Cosmeston

3.10 Taylor Wimpey support the designation of an active travel route connection the eastern side of Sully with Cosmeston in the north-east. Most notably the proposed route will pass Swanbridge Road which provides direct access to Land West of Swanbridge Road Site, with Phase 3 in close proximity to the travel route. The proposal would further enhance the accessibility and sustainability of the Site as a logical extension for residential development in Sully.

Figure 4 Extract of Deposit RLDP Proposals Map with Land West of Swanbridge Road (Phase 3) Identified

TR1 (6) Highway Improvement works: Weycock Cross Roundabout, Barry

3.11 Taylor Wimpey raise concerns around the proposed works at the Wyecock Cross Roundabout, compared to the other improvement works proposed. As noted in the Deposit RLDP, this roundabout forms a key connection within the wider strategic highway network and therefore of high importance for the local area and surrounding communities. The

proposed options presented within the Deposit RLDP provide little certainty of the scope of works required with no preferred option identified. This raises concerns around the impacts of the highway improvements on the deliverability of the adjacent draft allocation of North West Barry. The same concerns arise when considering the roundabout improvement works in combination with the proposed access strategy contained within North West Barry's supporting information package. The proposed road widening measures (c.11m increase) required to make the draft allocation accessible would have a significant impact on the wider transport network at this strategic junction.

Policy CC1 (Residential Operational Net Zero Carbon Development)

3.12 The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) then setting out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.

3.13 As a starting point, Taylor Wimpey share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) is not appropriate. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this results to an uneven framework for housebuilders, significantly adding cost and reducing certainty.

3.14 The justification for exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.

3.15 There are two points to be made here:

3.16 Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage. This Written Ministerial Statement was subject to a judicial review which was dismissed with the position taken in it found to be legally sound.

3.17 Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations.

3.18 Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound.

3.19 Secondly, Taylor Wimpey have concerns with the approach that has been taken with regards to viability.

3.20 From Taylor Wimpey's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.

3.21 As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated.

3.22 Taylor Wimpey's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. Savills' experience is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.

3.23 Taylor Wimpey's other concern with this approach is that the figure assumed as being required to achieve the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is driven from a Cost Assessment report published in January 2024. With the Background Paper 9A Housing Land Supply and Housing Trajectory not forecasting first completion onsite until 2028/2029, there is likely to be a period of approximately five years from the establishment of the figure for delivering the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) and when the first units would be delivered onsite.

3.24 Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been

taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy CI1 (Open Space Provision)

3.25 This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.

3.26 Taylor Wimpey note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.

3.27 Taylor Wimpey is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter, Policy DNP5 Environmental Protection

3.28 Taylor Wimpey consider the inclusion of 'the loss of the best and most versatile agricultural land' to be at odds with the other elements listed, where unlike the others mentioned, the loss of agricultural land would have limited, if any, impact on people, residential amenity and property.

3.29 It is acknowledged that the loss of BMV agricultural land may impact the VoG's overall amount of high quality agricultural land, however this should be assessed against the existing high level of BMV agricultural land within the County. The extent to which its loss is considered "unacceptable" should be subject to the planning balance against the overriding need for affordable housing and local housing need. Consideration towards the farming business case and economic viability are also required within the planning balance. In the case of Land West of Swanbridge Road, the loss of BMV agricultural land remains the only constraint that cannot be overcome, as noted in the Candidate Site Assessment. Whilst the loss of high quality agricultural land should be avoided, Taylor Wimpey consider that where the merits of the Site are overwhelmingly in favour for sustainable residential development in a suitable and logical location, Policy DNP5 should not stand in the way of housing delivery.

3.30 Whilst Taylor Wimpey support the clause within the draft policy: "Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the impact identified to an acceptable level. Planning conditions may be imposed, or legal obligation entered into, to secure any necessary mitigation and monitoring processes." However, in the context of BMV agricultural land, it is not clear how the mitigating measures, in the form of planning conditions or legal obligations, can be applied. This reinforces the earlier view that the inclusion of 'the loss of the best and most versatile agricultural land', as currently worded within the draft policy, is at odds with the other elements listed where mitigation strategies for pollution can be suitably conditioned.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Redacted Deposit Representation Form - https://valeofglamorgan.oc2.uk/a/3c8
Redacted Candidate Site Rep Form - https://valeofglamorgan.oc2.uk/a/3c9
Redacted Candidate Site Rep Form 2 - https://valeofglamorgan.oc2.uk/a/3cv
Redacted ISA HRA Representation Form - https://valeofglamorgan.oc2.uk/a/3cb
Redacted Supporting Evidence - https://valeofglamorgan.oc2.uk/a/3g5

6851 Object

Document Element: Weycock Cross roundabout,

Respondent: Taylor Wimpey [386]

Agent: Savills

Summary:

Taylor Wimpey raise concerns around the proposed works at the Wyecock Cross Roundabout, compared to the other improvement works proposed. As noted in the Deposit RLDP, this roundabout forms a key connection within the wider strategic highway network and therefore of high importance for the local area and surrounding communities. The proposed options presented within the Deposit RLDP provide little certainty of the scope of works required with no preferred option identified. This raises concerns around the impacts of the highway improvements on the deliverability of the adjacent draft allocation of North West Barry. The same concerns arise when considering the roundabout improvement works in combination with the proposed access strategy contained within North West Barry's supporting information package. The proposed road widening measures (c.11m increase) required to make the draft allocation accessible would have a significant impact on the wider transport network at this strategic junction.

Full text:

1. Introduction

1.1.1 Savills is instructed by Taylor Wimpey PLC ('Taylor Wimpey') to respond to the consultation on the Deposit Plan as part of the preparation of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').

1.1.2 The submission is made in the context of Taylor Wimpey's position as the promoter of Site ID 376 (Land West of Swanbridge Road, Phase 3). The site is being promoted for a residential development comprising of 260 homes.

1.1.3 Taylor Wimpey is one of the UK's leading national housebuilders, with extensive experience in delivering high-quality residential developments across a wide range of local authority areas. The company has an established presence within the VoG area. Taylor Wimpey is in the process of delivering Phase 1 of the site with development of Phase 2 close to commencing to dovetail with the completion of Phase 1. Phase 3 would act as a logical extension to the site, effectively rounding off development in this part of Sully and dovetailing with Phase 2 which is anticipated to be completed in 2029.

1.1.4 The site was originally submitted as a candidate site as part of the Call for Candidate Sites stage in September 2022 by Taylor Wimpey. This was a comprehensive site submission demonstrating that the site was viable, deliverable and sustainable – the three tests for Candidate Sites to satisfy as set out in Paragraph 3.36 of the Development Plans Manual. The Candidate Site submission consisted of the following information:

• Archaeological Desk-based Assessment (prepared by RPS);
• Design Vision (prepared by Pegasus Group);
• Drainage Strategy & Flood Risk Assessment (prepared by Pheonix Design);
• Landscape Appraisal (prepared by Pegasus Group);
• Preliminary Ecological Appraisal (prepared by Soltys Brewster);
• High Level Viability Statement (prepared by Savills);
• Transport Technical Note (prepared by Vectos); and
• Supporting Statement (prepared by Savills).

1.1.5 Since then, and on behalf of Taylor Wimpey , Savills have also responded to the consultation on the Preferred Strategy in February 2024 as well as the Housing Growth in Barry consultation in July 2025 and the Housing Trajectory in October 2025.

1.1.6 This supporting statement is structured to initially comment on the approach taken by the VoG in assessing the Land West of Swanbridge Road, Phase 3 site before commenting on specific policies that are contained within the Deposit RLDP.

1.1.7 In general, Taylor Wimpey's position is that, at present, the Deposit RLDP is not sound but that it could be made sound through the amendments as suggested throughout this Statement.

2. Candidate Site Assessment Process and Integrated Sustainability Assessment
Introduction

2.1.1 Candidate sites are in essence assessed through two means – the Candidate Site Assessment Background Papers and the Integrated Sustainability Appraisal.

2.1.2 Taylor Wimpey's position is that both of these documents do not provide an adequate assessment of the Land West of Swanbridge Road, Phase 3 site.

2.1.3 Each is considered in turn below.

Candidate Site Assessment Process

2.1.4 All candidate sites have been assessed at Preferred Strategy stage (reported as Background Paper 18) and Deposit stage (reported as Background Paper 18a).

2.1.5 The reason for the Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site not being carried forward as part of these assessments was presented in Background Paper 18 at the time of publication of the Preferred Strategy with Backgropund Paper 18a providing no further site analysis. The reason for the site not progressing this stage of the Candidate Site assessment process is as follows:

"Development of the site would lead to a loss of the Best and Most Versatile Grade 3a agricultural land contrary to national policy."

2.1.6 Whilst parts of the site do constitute Best and Most Versatile (BMV) land, Taylor Wimpey's position is that there are compelling reasons relating to the site's context and how it is utilised that mean a more nuanced position needs to be taken. Without such nuance, the RLDP risks not allocating a site that, whilst perhaps containing BMV, is otherwise suitable for development and more suitable for development then sites that the Deposit RLDP proposes to instead

allocate.

2.1.7 Included at Appendix A, and included as part of Taylor Wimpey's representations on the Preferred Strategy and the Housing Growth in Barry consultations, is an Agricultural Assessment prepared by The Andersons Centre.

2.1.8 The key conclusions from this Assessment are that:

• The site is farmed by a tenant farmer whose main base is approximately 12km away which presents logistical and practical challenges. These challenges are exacerbated by the lack of farm buildings and the fact that there is no mains electricity;

• The site forms part of a wider 230 acre farm and so the cessation of agricultural practices on this parcel will not, by virtue of its size, prejudice the continued farming of the wider land parcel;

• The tenant farmer farms approximately 3,000 acres of land and so the loss of the ability to farm this parcel will have a negligible impact on the continuation of their agricultural operations;

• The site is bound on two sides by existing or permitted housing, on a third boundary by a railway line, and on its eastern boundary by a road; and

• Farming of the land does not support a high level of employment and if the land was lost for development, 0.15 of a full time labour unit's equivalent work would be lost.

2.1.9 Taking the above together, the conclusion needs to be reached that the site's size and context presents challenges for farming and that the development of Phase 2 by Taylor Wimpey has the potential to exacerbate these challenges. Aligned to this, the level of employment that the farming of the site supports is negligible and the cessation of farming of this particular parcel of land will not materially impact either the continued farming operations of the wider farm that the land sits apart of or the tenant farmer that farms the land.

Integrated Sustainability Appraisal

2.1.10 The Initial Integrated Sustainability Appraisal undertaken at Preferred Strategy stage provides a GIS based appraisal of all sites against 17 objectives. Inherently the Initial Integrated Sustainability Appraisal can be a bit of a blunt tool but Taylor Wimpey's position is that the site performs better against a substantial number of the 17 objectives than the current assessment.

2.1.11 Included at Appendix B is an assessment undertaken by Taylor Wimpey which provides commentary against certain objectives and suggests why the site performs considerably better than forecast in the Initial Integrated Sustainability Appraisal.

2.1.12 A summary of this is presented below:
Table 1 Summary of ISA and Suggested Taylor Wimpey Approach

2.1.13 Taylor Wimpey's position here is clear – the inadequacy of the Integrated Sustainability Appraisal as a tool for assessing candidate sites can only be appropriate where the Integrated Sustainability Appraisal is done correctly and considers the mitigation measures that a candidate site submission proposed to put in place. Without this, the Integrated Sustainability Appraisal risks a situation – as Taylor Wimpey suggest has been the case in Policy HG1 KS1 – where a Key Site is selected in favour of alternative sites that are better performing.

3. Deposit Plan

3.1 Introduction

3.1.1 The following section of this Statement comments on the relevant Key Themes, Strategic Objectives and draft Policy Framework forming part of the Deposit Plan Consultation.

3.1.2 The Policy Framework has been reviewed with comments provided on only those policies considered to be of most relevance to Land West of Swanbridge Road (Phase 3), Sully. The position on individual policies contained within the Deposit RLDP are summarised in the table below:

Table 2 Taylor Wimpey Policy Position

Relevant Policy Support or Object
SP1 Sustainable Growth Strategy - Object
SP2 Settlement Hierarchy - Support
SP 6 Housing Requirement - Object
HG1 Housing Allocations: HG1 KS1 – Land at North West Barry - Object
TR1 Transport Proposals: TR1(2) Active Travel Route Sully to Cosmeston - Support

TR1 Transport Proposals: TR1(6) Highway Improvement Works Weycock Cross Roundabout - Object
CC1 Residential Operational Net Zero Carbon Development - Object
CI1 Open Space Provision - Clarity required
DNP5 Environmental Protection - Object as currently worded

3.2 Key Themes and Strategic Objectives

Homes For All

3.2.1 As noted in paragraphs 3.17 and 3.18 of the Deposit Plan the VoG has the highest affordability ratio in Wales with average house prices 9.7 times the average workplace earnings compared to the Welsh average, giving rise to a significant need for affordable homes which is under significant pressure. This highlights the ever increasing need for sufficient high quality housing, which Taylor Wimpey are committed to provide and supply the mix, type and tenure of housing needed within the local authority's growing population.

Placemaking

3.2.2 Taylor Wimpey embed strong placemaking standards across their developments as detailed within their Placemaking Charter. Taylor Wimpey consider Land West of Swanbridge Road (Phase 3) to present an opportunity to provide a comprehensive residential development that is accessible and well-connected with the existing settlement of Sully and compliments the earlier phases of development. As demonstrated in the earlier phases of development, the Site offers a sustainable location for future growth with easy access to a range of services and facilities in Sully.

Protecting and Enhancing the Natural Environment

3.2.3 Taylor Wimpey support the VoG's commitment to protect and enhance the natural environment through the integration of green/blue infrastructure network and the sustainable management of resources within the VoG. However where Objective 5 seeks to safeguard land from inappropriate development, proposals must be subject to the relevant planning balance giving weight to the surrounding land use and appropriateness of safeguarding agricultural land that would otherwise be unconstrained and considered suitable for development given the outstanding need for housing.

Promoting Active and Sustainable Travel Choices

3.2.4 Taylor Wimpey support the promotion of sustainable travel and active modes of transport, including the provision of designated active travel routes that improve the connectivity between primary and key settlements, such as the Sully to Cosmeston active travel route.

3.2.5 As demonstrated in the earlier phases of Land West of Swanbridge Road, Taylor Wimpey support the promotion of active travel within new developments and provide opportunities for residents to easily engage with active travel.

3.3 Policy Framework

Policy SP1 Sustainable Growth Strategy

3.3.1 Taylor Wimpey's comments on this policy relate to the sustainable growth strategy in so much as it relates to the spatial strategy rather than the housing requirement that the RLDP adopts with further comments on the housing requirement provided in connection to Policy SP6 (Housing Requirement).

3.3.2 Taylor Wimpey appreciate the need to balance the ten strategic objectives against the need for growth and protection of the VoG's natural and built environment, and strongly support the strategic objective to provide homes for all. Taylor Wimpey maintain their position on the proposed growth strategy that has been established within earlier consultation responses submitted throughout the RLDP process, including the most recent consultation on 'Growth Options in Barry'.

3.3.3 Taylor Wimpey consider that to date the growth strategy has placed disproportionate emphasis on identifying an alternative site within Barry, rather than giving due consideration to potential sites in nearby high-performing settlements such as Sully. Taylor Wimpey therefore strongly encourage the VoG to widen the search for additional allocations beyond the administrative boundary of Barry Town Council and to consider locations that represent a logical and sustainable extension to neighbouring primary settlements that are located within the Strategic Growth Area, including Sully.

3.3.4 The six key elements of the Sustainable Growth Strategy are noted and Taylor Wimpey support a spatial strategy that locates major new development for the delivery of sustainable housing growth in appropriate locations, such as Sully, that are supported by the relevant infrastructure, services and facilities. Providing new homes within Phase 3 aligns with the Strategic Growth Area identified within the RLDP Strategy which forms the primary focus for housing growth.

3.3.5 Policy SPG1 continues to identify Sully as a location where new housing development will be concentrated, therefore establishing a principle of development for Phase 3 and help to further align the provision of new housing with

the existing facilities of Sully, reducing the need to travel. Sully represents an inherently sustainable location for future growth and aligns well with the Sustainable Transport Oriented Growth Option. As identified in the Deposit RLDP, Sully is classified as a Primary Settlement and performs a complementary role to Barry as a key centre. Its position within the Strategic Growth Area further indicates that an appropriate level of development at Sully would be acceptable, with both existing housing delivery and the current allocation at Swanbridge Road supporting its established role.
3.3.6 With existing development ongoing to the north of the Site, at Phases 1 and 2 of Land West of Swanbridge Road, Phase 3 is considered to provide an appropriate level of growth in a sustainable location that would form a logical extension to existing allocations. The sustainability and suitability of Sully to accommodate residential development is reinforced by the allocation of 500 dwellings under Policy MG2(37) ('Land West of Swanbridge Road, Sully') on land directly north of the site promoted by Taylor Wimpey. The progression of this location into a phase 3 development would continue to strengthen Sully's function as a primary settlement and would constitute a logical and coherent extension to the existing built form.

Figure 1 Extract of Growth Strategy

3.3.7 Taylor Wimpey appreciate the aspirations of the Council to deliver housing to meet the identified future housing needs of the VoG and wider growth aspirations of the South East Wales Region at a strategic level. Taylor Wimpey support the revised strategy moving away from North East Barry, however maintain the position that this level of growth should be re-allocated to those locations that are most suitable for growth, including sustainable settlements outside of Barry. Growth should not be focuses solely on Barry.

Policy SP2 Settlement Hierarchy

3.3.8 Taylor Wimpey support the conclusions of the Settlement Appraisal Review Background Paper which identifies Sully as a Primary Settlement, reflecting its important role in providing a level of housing growth, in addition to key local services and facilities. Within this Background Paper, Sully is recognised for its vital role as a sustainable community, scoring highly across all key principles in demonstrating its sustainability by providing for the day-to-day needs of its residents. Taylor Wimpey concur with the supporting evidence which reinforces Sully's importance within the settlement hierarchy.

3.3.9 Whilst Draft Policy SP2 presents a 'broad distribution of development within the Strategic Growth Area..', serious concerns continue to be raised around the level of growth around Barry and the emphasis placed on it as the focus for future development. Taylor Wimpey do not dispute the identification of Barry as a Key Settlement, given its position as the largest town within the VoG, however believe Barry should not remain the sole focus for growth where there are opportunities available around primary settlements located within the Strategic Growth Area.

3.3.10 Put another way, it seems perverse for the Deposit RLDP to direct no new growth to a Primary Settlement within the identified Strategic Growth Area.

Policy SP 6 Housing Requirement

3.3.11 The purpose of this policy is to set the housing requirement and then identify the components of supply that are anticipated to meet this housing requirement. A number of Background Papers (nos. BP7, BP8, BP8A, ad BP9A) underpin the approach that is taken. Taylor Wimpey have a number of comments to make on the approach taken in this policy.

Housing Requirement

3.3.12 The approach taken in the Deposit RLDP, as with the Preferred Strategy beforehand, is for the housing requirement to make use of a 10 year dwelling-led scenario, an approach that reflects past completions and looks to extrapolate this forward over the lifetime of the RLDP.

3.3.13 Taylor Wimpey provided detailed commentary on the proposed housing requirement in their comments on the Preferred Strategy but note that Welsh Government have subsequently provided their comments on the Preferred Strategy raising no objection with the housing requirement proposed to be taken.

3.3.14 Taylor Wimpey's position though remains – if a dwelling-led scenario is to be used to determine the housing requirement then it needs to have a far shorter scenario length then 10 years as the first three years of the 10 year period selected were when supply was suppressed as a result of the current LDP not having been adopted.

3.3.15 That said, there is a clear contextual change since the Preferred Strategy was adopted, this being the publication of the 2022-based household projections have been published. Table 5 of Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections provides a comparison of the 2022-based projections with the 2018-based projections and the Deposit RLDP's housing requirement. A simplified version of this table is shown overleaf:

Table 3 RLDP Housing Requirement
Scenario Housing Requirement
RLDP 7,587
2018-based projections 6,214

2022-based projections 9,623

3.3.16 This is important as Paragraph 4.2.6 of PWW states that:

'The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans.'

3.3.17 The proposed approach of continuing to use the 10 year dwelling-led scenario, as a methodology, clearly does not do this.

3.3.18 The approach of using the 2022-based household projections would comply with the aspirations of PPW. Taylor Wimpey's position is that the commentary provided in the Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections for not using 2022-based projections is wholly inadequate and that these projections should be used.

Flexibility Allowance

3.3.19 Paragraph 5.58 of Edition 3 the Development Plans Manual (March 2020) makes it clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes the RLDP should plan for. This is in the interest of ensuring that sufficient housing is delivered in the event of some allocated sites either not delivering in their entirety or delivering less homes than anticipated. Paragraph 5.59 of the Manual clarifies that the extent of the flexibility allowance should be informed by local issues with 10% as a starting point (i.e. as the minimum).

3.3.20 The Adopted Local Development Plan (ALDP) applies a 10% flexibility allowance on top of the housing requirement for 9,460 homes so that provision is made for 10,408 homes.

3.3.21 Paragraph 1.2.34 of the Annual Monitoring Report 2024-2025 provides a comparison of the number of homes that have been completed and the level of completions that the ALDP anticipates. This shows that 6,999 homes have been delivered up to 1st April 2025 against a cumulative dwelling target of 8,829 homes, representing a shortfall of 20.7%.

3.3.22 Taylor Wimpey's point here is that the ALDP's flexibility allowance of 10% is insufficient to ensure that the ALDP's housing requirement is actually being delivered. This is clear evidence that a higher flexibility allowance should be used for the RLDP. Although for different reasons, but following a direction from the Welsh Government Planning Inspector, Bridgend County Borough Council has increased its flexibility allowance to 20% and, it is considered that such a buffer is appropriate for the VoG's RLDP.

Non-Delivery Allowance on Land Bank

3.3.23 Line C of Table 2 of the Preferred Strategy relates to those sites that either benefit from planning permission or are subject to a resolution to grant planning permission subject to planning permission. Combined, these sites are identified as having capacity for 1,860 homes.

3.3.24 The current approach, which assumes that all other sites which are under construction or sites where there is either a planning permission in place or sites where there is a resolution to grant planning permission subject to the signing of a Section 106 agreement will be completed in full, causes concern for Taylor Wimpey.

3.3.25 There are multiple reasons why homes that benefit from either planning permission or a resolution to grant planning may not be delivered. These relate to viability, but also to specific site constraints and landowner intentions.

3.3.26 A point that is separate, but inherently linked, to the above is that often the capacity of a site for which reserved matters approval is sought is less than that permitted at outline stage. Requirements for SAB approval and the demonstration of a biodiversity net benefit, for example, reduce the capacity of a site at detailed design stage but are often not factored in at outline stage, particularly where the outline application is not progressed by a housebuilder.

3.3.27 Research undertaken by the Local Government Association for England (no such data is available for Wales) suggests that, between 2010/2011 and 2019/2020 a total of 2,782,300 dwelling were granted planning permission whilst there were only 1,627,730 completions. This means that during this period just 58.5% of those homes which were granted planning permission were completed.

3.3.28 Taylor Wimpey is not suggesting that applying a discount of 41.5% is necessarily correct and the above is both from England and a few years out of date but the need for a discount that relates specifically to Line C is very clear.

3.3.29 It's difficult to know what this figure should be but Taylor Wimpey suggest that a 20% figure is used to reflect the flexibility allowance.

Windfall Allowances

3.3.30 The approach taken in the Deposit RLDP is to assume that 1,303 homes will be delivered across Windfall Sites. This has been calculated on the basis of previous completion delivered as windfalls.

3.3.31 Taylor Wimpey's concern is that the delivery of homes on Windfall Sites inherently becomes more challenging over time as the easier to develop sites have been delivered and the buildings and land that hasn't been developed is subject to increasing levels of policy protection. The approach taken by Cardiff Council in their Deposit RLDP is to assume that 75% of the 10 year average Windfall Sites will be delivered and such an approach seems entirely appropriate in this case.

3.3.32 An Urban Capacity Study (October 2023) prepared by the VoG, seeks to corroborate this by identifying 2,627 homes that could be delivered across the VoG. Whilst the windfall allowances would be less than the suggested urban capacity, this shouldn't be seen as problematic or as a conflict as the purpose of the Urban Capacity Study is, as the name suggests, just to identify sites which may have capacity. It doesn't account for land ownership (and whether the land owners have aspirations to dispose of the site) or development viability. In addition, the approach taken to site capacity to is to assume a density based on site type but it does this without an appreciation of site constraints and is based on the gross rather than net area.

Rolled Forward Sites

3.3.33 Taylor Wimpey have concerns with the approach that is taken in Table 2 of the Deposit RLDP which identifies allocations for 959 homes that are to be rolled over from the ALDP to the RLDP.

3.3.34 Concerns are raised around two sites in particular - Land to the west of Pencoedtre Lane, Barry and Land between new Northern Access Road and Eglwys Brewis Road, These sites are allocated in the ALDP but have failed to be delivered. Given the longstanding period during which there has been clear policy support for development but no completions, it follows that there are serious concerns around the deliverability of these two sites which, together, are allocated for 370 homes.

3.3.35 The failure to deliver these dwellings is due to a number of factors which are detailed in Taylor Wimpey's Preferred Strategy consultation response, which questions whether these sites will deliver at all or at a significantly reduced capacity due to the following reasons:

- Viability constraints;
- Site specific constraints;
- Landowner intentions;
- Requirements for SAB approval; and
- Biodiversity net benefit;

3.3.36 Whilst it is recognised that there may be policy support for the delivery of these two sites, there deliverability is clearly uncertain and they should be removed from Table 2.

Conclusion

3.3.37 The following table summarises the approach previously proposed in the Deposit RLDP and compares it to the amendments suggested by Taylor Wimpey in the preceding sections of this Statement.

Table 4 Deposit RLDP Housing Supply and Taylor Wimpey's Suggested Approach
Housing Supply - Deposit Plan (December 2025) - Taylor Wimpey Suggested Approach (March 2026)
Housing Requirement - 7,890 - 9,623
Flexibility Allowance - 10% - 20%
Flexibility Allowance – 770 - 1,925
Housing Requirement + Flexibility Allowance - 8,660 - 11,548
A – Completions - 1,747 - 1,747
B – Units Under Construction - 313 - 313
C and D- Units with Planning Permission Minus Non-Delivery Allowance - 1,777 1,488
Existing Supply - 3,827 - 3,548
E – Large Windfall Sites - 720 - 540
F – Small Windfall Sites - 583 - 438
E+ F Total Windfall Allowance - 1,303 - 978
RLDP Allocations - 3,520 - 3,150

3.3.38 The conclusion reached in Taylor Wimpey's analysis is that, as a result of both the suggested housing requirement and flexibility allowance combined with Taylor Wimpey's comments on the components of supply, the Deposit RLDP needs to find allocations to deliver a further 3,872 homes.

Policy HG1 KS1 – Land at North West Barry
3.3.39 Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement

of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. Taylor Wimpey has provided comments on the housing requirement that is set in the RLDP and the components of supply that are anticipated to meet it in the proceeding sections of this Statement.

3.3.40 As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.

3.3.41 There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.

3.3.42 Policy HG1 KS1 proposes to allocate the site known as 'Land at North West Barry'.

3.3.43 The proposed allocation of this site follows a consultation – entitled 'Housing Growth in Barry' - undertaken by the VoG in July 2025 which proposed to allocate three sites in Barry as an alternative to the North East Barry site that was identified as a Key Site in the Preferred Strategy but was considered to no longer be deliverable.

3.3.44 Taylor Wimpey responded as part of the 'Housing Growth in Barry' consultation, supporting the removal of North East Barry as a Key Site but raising serious concerns with the proposed allocation of 'Land at North West Barry' as an alternative.
3.3.45 These concerns remain and Taylor Wimpey strongly consider there need to be other alternative sites – such as Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) - within nearby settlements that perform better than the Land at North West Barry site and should be allocated for housing.
3.3.46 To support this conclusion, Taylor Wimpey has undertaken a review of the Integrated Sustainability Appraisal (ISA) which provides a scoring of different candidate sites against the 17 objectives as well as considering and comparing the sustainability and accessibility of the two sites.

Integrated Sustainability Appraisal

3.3.47 The below table provides a comparison of how the Integrated Sustainability Appraisal scores Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) compared to the Land at North West Barry site. Two different comparisons are provided – one which compares the actual scoring in the ISA and a second which compares the two sites following Taylor Wimpey's suggested scoring which is included as Appendix A.

3.3.48 These tables clearly highlight where the subject site out performs North West Barry across numerous objectives.

Table 5 Comparison of Phase 3 Land West of Swanbridge Road (Site ID 376) and North West Barry (Site ID 490) ISA performance

3.3.49 From an initial review, the Integrated Sustainability Appraisal shows that Land West of Swanbridge significantly outperforms North West Barry in terms of the number of significantly positive scores '++' and the number of '—' scores. To this end the subject site provides clear advantages above and beyond North West Barry in terms of homes, health, and transport. As such Land West of Swanbridge is considered to have the capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge; The site is within 800m of a health service and an active travel route; and, The site is within close proximity (≤800m) to a railway station or bus stop, town/ retail centre and an active travel route. Taylor Wimpey consider this assessment should go further to recognise the associated benefits to the leisure than be provided by the site's development.

3.3.50 Following Taylor Wimpey's re-assessment of the site against the Integrated Sustainability Appraisal ISA objectives it is also considered to obtain notably more positive '+' scores than North West Barry. It is also worth noting that North West Barry has more unknown impacts than Land West of Swanbridge which introduces a level of uncertainty around its potential for further negative impacts. Moreover, North West Barry scores a significant number of negative impacts across the ISA, with the extension site obtaining double the amount than Land West of Swanbridge Road.

3.3.51 Taylor Wimpey's position is that it would be unsound to allocate a site that performs considerably poorer in the Integrated Sustainability Appraisal than a site that is not proposed to be allocated.

Accessibility and Sustainability

3.3.52 SLR Consulting have prepared an updated document demonstrating the Site's sustainability credentials and providing a detailed overview of existing and future active travel and public transport infrastructure. This is included as Appendix C.

3.3.53 As a starting point, it considers those services within Sully. In terms of local amenities, the population size of

Sully, naturally benefits from a good range of local amenities and services, and therefore it is anticipated that a high proportion of future residents' day-to-day journeys would be contained within the village and undertaken via walking or cycling. The Walking Catchment Map prepared by SLR demonstrates this and illustrates services within walking distance from the Site.

3.3.54 The proposed development benefits from local existing and future / planned infrastructure which will help support travel by sustainable modes such as walking, cycling and public transport. The Site falls within the less than 15 minutes Public Transport Catchment for bus and rail services. The Site is supported by the existing bus network, connecting Sully with Barry, Penarth and Cardiff – the nearest bus stop approximately 400m from the centre of the site; Moreover the Site is within proximity to Cadoxton and Penarth railway stations which have regular services in each direction in addition to the existing walking and cycling infrastructure in and around Sully.

3.3.55 The future accessibility of the Site will be further enhanced through the ongoing and planned South Wales Metro improvements, future active travel routes and the proposed Sully to Penarth mixed use link. The below figure shows several newly proposed active travel routes running close to the site including a new walking / cycling route along Swanbridge Road. Planning applications are now being submitted to support the delivery of these new active travel links. In March 2025 a planning application was submitted proposing a new route between Palmerstown and Dinas Powys.

3.4 SLR have undertaken further assessment work comparing the sustainability credentials of Land West of Swanbridge Road to Land North West of Barry. Land North West of Barry, is separated from the existing built-up area by the B4266 Pontypridd Road where the eastern and southern boundaries abut residential properties. As such, the proposed access for all modes would be taken from the A4226 Port Road West. The A4226 and B4266 can be a barrier to the promotion of active travel in that they facilitate vehicular travel and do not provide an attractive environment for pedestrians.

3.5 Furthermore, Land North West of Barry is on the fringes of Barry and had few if any facilities within a 10 minute walk, other than bus stops. In comparison, Land West of Swanbridge Road in Sully benefits from its proximity to the High Street in Sully and the services there.

3.6 The below table demonstrates differences in accessibility to amenities between the two sites, where Land West of Swanbridge Road presents a more favourable location for future development.

Table 6 Comparison of Local Facilities Between Land North West of Barry (Site ID 449) and Land West of Swanbridge Road (Phase 3) (Site ID 376)

3.7 Whilst the walking distance shown from Land North West of Barry to the nearest bus stop is slightly less than the Swanbridge Road Site, it should be noted that the bus services that can be accessed from Sully are more frequent and more direct than those which can be accessed from Land North West of Barry.

Conclusion

3.8 Taking the above together, the conclusion Taylor Wimepy reach is that their Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site performs more strongly than the Land North West of Barry site.

Policy TR1 Transport Proposals

3.9 The draft transport proposals contained within the Deposit RLDP have been reviewed with the following proposals considered to be pertinent to the Site and draft residential allocations.

TR 1 (2) Active Travel Route: Sully to Cosmeston

3.10 Taylor Wimpey support the designation of an active travel route connection the eastern side of Sully with Cosmeston in the north-east. Most notably the proposed route will pass Swanbridge Road which provides direct access to Land West of Swanbridge Road Site, with Phase 3 in close proximity to the travel route. The proposal would further enhance the accessibility and sustainability of the Site as a logical extension for residential development in Sully.

Figure 4 Extract of Deposit RLDP Proposals Map with Land West of Swanbridge Road (Phase 3) Identified

TR1 (6) Highway Improvement works: Weycock Cross Roundabout, Barry

3.11 Taylor Wimpey raise concerns around the proposed works at the Wyecock Cross Roundabout, compared to the other improvement works proposed. As noted in the Deposit RLDP, this roundabout forms a key connection within the wider strategic highway network and therefore of high importance for the local area and surrounding communities. The proposed options presented within the Deposit RLDP provide little certainty of the scope of works required with no preferred option identified. This raises concerns around the impacts of the highway improvements on the deliverability of the adjacent draft allocation of North West Barry. The same concerns arise when considering the roundabout improvement works in combination with the proposed access strategy contained within North West Barry's supporting information package. The proposed road widening measures (c.11m increase) required to make the draft allocation accessible would have a significant impact on the wider transport network at this strategic junction.

Policy CC1 (Residential Operational Net Zero Carbon Development)

3.12 The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) then setting out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.

3.13 As a starting point, Taylor Wimpey share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) is not appropriate. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this results to an uneven framework for housebuilders, significantly adding cost and reducing certainty.

3.14 The justification for exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.

3.15 There are two points to be made here:

3.16 Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage. This Written Ministerial Statement was subject to a judicial review which was dismissed with the position taken in it found to be legally sound.

3.17 Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations.

3.18 Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound.

3.19 Secondly, Taylor Wimpey have concerns with the approach that has been taken with regards to viability.

3.20 From Taylor Wimpey's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.

3.21 As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated.

3.22 Taylor Wimpey's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. Savills' experience is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.

3.23 Taylor Wimpey's other concern with this approach is that the figure assumed as being required to achieve the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is driven from a Cost Assessment report published in January 2024. With the Background Paper 9A Housing Land Supply and Housing Trajectory not forecasting first completion onsite until 2028/2029, there is likely to be a period of approximately five years from the establishment of the figure for delivering the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) and when the first units would be delivered onsite.

3.24 Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy CI1 (Open Space Provision)

3.25 This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the

policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.

3.26 Taylor Wimpey note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.

3.27 Taylor Wimpey is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter, Policy DNP5 Environmental Protection

3.28 Taylor Wimpey consider the inclusion of 'the loss of the best and most versatile agricultural land' to be at odds with the other elements listed, where unlike the others mentioned, the loss of agricultural land would have limited, if any, impact on people, residential amenity and property.

3.29 It is acknowledged that the loss of BMV agricultural land may impact the VoG's overall amount of high quality agricultural land, however this should be assessed against the existing high level of BMV agricultural land within the County. The extent to which its loss is considered "unacceptable" should be subject to the planning balance against the overriding need for affordable housing and local housing need. Consideration towards the farming business case and economic viability are also required within the planning balance. In the case of Land West of Swanbridge Road, the loss of BMV agricultural land remains the only constraint that cannot be overcome, as noted in the Candidate Site Assessment. Whilst the loss of high quality agricultural land should be avoided, Taylor Wimpey consider that where the merits of the Site are overwhelmingly in favour for sustainable residential development in a suitable and logical location, Policy DNP5 should not stand in the way of housing delivery.

3.30 Whilst Taylor Wimpey support the clause within the draft policy: "Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the impact identified to an acceptable level. Planning conditions may be imposed, or legal obligation entered into, to secure any necessary mitigation and monitoring processes." However, in the context of BMV agricultural land, it is not clear how the mitigating measures, in the form of planning conditions or legal obligations, can be applied. This reinforces the earlier view that the inclusion of 'the loss of the best and most versatile agricultural land', as currently worded within the draft policy, is at odds with the other elements listed where mitigation strategies for pollution can be suitably conditioned.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Redacted Deposit Representation Form - https://valeofglamorgan.oc2.uk/a/3c8
Redacted Candidate Site Rep Form - https://valeofglamorgan.oc2.uk/a/3c9
Redacted Candidate Site Rep Form 2 - https://valeofglamorgan.oc2.uk/a/3cv
Redacted ISA HRA Representation Form - https://valeofglamorgan.oc2.uk/a/3cb
Redacted Supporting Evidence - https://valeofglamorgan.oc2.uk/a/3g5

6940 Comment

Document Element: Cogan Transport Interchange.

Respondent: Penarth Town Council (Mr Pete Newton, Principal Policy, Innovation and Development Officer) [1125]

Summary:

Members did note the inclusion of Cogan Transport Interchange under section 6.196 but would have liked to see more information about its future developments as they see it as key to increasing public transport use to Barry and further to West Wales in general.

Members wished to advise that issues with both the bridge and the platforms at Cogan have been long term, with accessibility being central to these issues. Members felt that improvements to accessibility should be a priority at this site, with planting and landscaping considered secondary to this.

Members felt it was key to consider the additional stress on Penarth from increased anticipated demand of public transport needs and emphasised the need for this to be aptly considered by bus route providers as part of development work.

Full text:

Penarth Town Council Deposit RLDP Consultation Response

Comments collated at a meeting of the Council's Consultation Task and Finish Group on 9th February 2026

Some Members attended the RLDP consultation drop-in session in Penarth and in general found it to be very informative.

Members support the general development strategy but did note the lack of information concerning discussions with adjacent and other nearby Principal Councils in the CJC Region. In view of the forthcoming Strategic Development Plan, encompassing the ten authorities, members felt that some further commentary regarding this is warranted.1

It is clear that the approach taken in the Cardiff paper is still that ideally, each Council is self-contained and "consumes its own smoke," which does not show any wider strategic thinking between the ten authorities in preparation for a regional Strategic Development Plan.

Members agreed with the view that infrastructure to support new housing developments was required in order to create successful developments, although they acknowledged that logistically it was difficult to pre-empt demand for some services such as travel and health services. Members also noted that predicting developmental needs and opportunities within wider context surrounding the UK's economic, political, and social landscapes.

Members noted that there was not much focus on Penarth or identified potential future development for Penarth beyond that already underway at the location near to Cosmeston but welcomed flexibility in its approach. Members expected to be more closely involved in the decisions and planning of this, and other such developments, and provide opportunity for wider consultation where appropriate, such as pre-application consultations, as well as would expect to be included in consultations concerning sites adjacent to Llandough, Dinas Powys, and Sully given their impact upon the town.

Penarth as a town is currently developed to its boundaries, save for the development at Cosmeston. It is, therefore, more dependent than other Service Centres on windfalls of land or buildings which may arise during the currency of the Plan. In 2023, an extensive assessment of the potential of the town concluded the following:

"There is marginally less capacity in Penarth [and Llandough] than the projected figures. However, this does not mean that the projections are incorrect or unjustifiable. The reported figures have not included a significant amount of capacity on open space land, and the projected figures for conversion of existing buildings and intensifications will be surpassed if the extant consents that exist this early in the Plan period are implemented."

The degree of flexibility, however, is substantially depending on one large site. P009, Headland School, is identified as both a potentially disused building and as a site with a capacity of 111-120 units. This special school is full to capacity and used by many Council in both Wales and England.

Members did note the inclusion of Cogan Transport Interchange under section 6.196 but would have liked to see more information about its future developments as they see it as key to increasing public transport use to Barry and further to West Wales in general.

Members wished to advise that issues with both the bridge and the platforms at Cogan have been long term, with accessibility being central to these issues. Members felt that improvements to accessibility should be a priority at this site, with planting and landscaping considered secondary to this.

Members felt it was key to consider the additional stress on Penarth from increased anticipated demand of public transport needs and emphasised the need for this to be aptly considered by bus route providers as part of development work.

Members wanted to see a strategy that actively protects the town's heritage and culture whilst still being able to provide for current and future generations.

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16 and section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report2, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Under CC2, it was noted that the presumption against demolition3 in favour of retrofit and reuse may constrain maximum transition to net zero as, whilst there is grant aid available for public buildings and social housing, the retrofit monies available for private stock is limited.

Additional considerations will also need to be made as part of the Third Carbon Budget (2026-2030), Local Area Energy Plans and the climate change ISA theme.

Members also felt similar about the inclusion and consideration of sustainable development through the specific strategy outlined in section 5 of the document and felt this linked in well with ongoing Placemaking work and its strategic approach as detailed in SP4.

Members were pleased to see mention of the diversification of high streets, although noted that Penarth was above

average in terms of occupancy. They hoped that the RLDP would be able to support the town centre and support other ways it could be improved, such as a fishmonger or identifying a site for a new Cemetery.

With Penarth classified as a Service Centre, they are identified as having a defined role. However, the decline of in-person retailing means that defining role is not that evident, and Members felt there is potentially a need to move away from the traditional retail role of Town Centres in favour of "repurposing, creating multifunctional, commercial, and service centres that meet the needs of the communities they serve" in line with Future Wales Town Centre First Policy. The term 'repurposing' suggests a stronger role for the public sector in enabling these new purposes, and Members felt that Placemaking Plans could be one potential framework for this.

Members felt that potential functional support that could be provided could include:
• The appointment of a Town Centre Manager
• Using supporting interventions such as an extension or reshaping of normal services such as Neighbourhood Services.
• Using existing or emerging new powers, such as compulsory purchases.

Members wished for the RLDP to facilitate the safeguarding of essential public services, including health, policing, fire and rescue in the town, which would help to develop the defining role of a Service Centre, and felt that specific reference to these would be beneficial.

Members supported the avoidance of coalescence with adjacent settlements through the reconfirmation of Green Wedges as it allows for relevant extensions to those settlements whilst allowing them to retain their identity.

Members noted that the Quiet Area provision under DNP6 only applies to Penarth and wished to know why this was the case.

Members advised that they welcomed further opportunity for consultation, particularly in relation to developments in the neighbouring Cardiff Bay area whilst acknowledging that this is not necessarily an RLDP concern.

Footnotes

1 There is an evidence paper concerning relations with Cardiff and a Statement of Common Ground with Bridgend. However, there is only a reference in the RLDP text to discussions with other regional Councils and not the paper itself. We would be grateful if you could provide the paper as it does impact on the soundness of this Plan.

2The UK Climate Change Committee's 'Progress Report: Reducing Emissions in Wales' highlighted the following aspects of import: Skills, Vehicle Charging Networks, Improving Recycling, Energy Plans, Decarbonising Public Buildings and Social Housing, and reducing Road transport Demand (Car-Kilometres).

3The UK Environmental Audit Committee (2022) noted that "the evidence we received consistently recommended that retrofit and reuse be prioritised over new build."

Change suggested by respondent:

Members want more detail on Cogan Transport Interchange's future developments.

Improving bridge and platform accessibility should be a priority, before before landscaping.

Bus providers must address the increased pressure on local transport services.

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3d5

7045 Object

Document Element: St Athan Transport

Respondent: Marion morgan [2413]

Agent: Geraint John Planning Ltd

Summary:

It is now the case that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport for Wales. This paper acknowledges that a new railway station at St Athan would represent a longer-term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations.

Full text:

ANNEX 1

Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ystradowen area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:
VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Ystradowen. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months
• "Time between submission of planning application and determination" – 6 months

• “Time taken from planning consent to the discharge of relevant conditions to enable site construction” – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period (‘Land at Readers Way’ and ‘Land to the West of St Athan’). These sites do not allow for any ‘slippage’ should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would ‘fail’ in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that “Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan”.

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

“3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.”

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:
Table 6: Existing LDP allocations to be carried forward

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over

the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.
Extract of Housing Trajectory (annotated by GJP - red dotted line)

It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.
Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.
HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.
Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.
It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land at Ystradowen (Site ID: 430 / 4060) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) and Annex 2 for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 230 affordable homes in the Cowbridge housing market area / ward - which Ystradowen is located within. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation – see Annex 2.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out

above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ystradowen and the proposed site. As outlined within these representations, it is considered that the site (ID 430) represents a sustainable, deliverable and acceptable site. The site is located within 2.7 miles Cowbridge and 2.8 miles of Pontyclun. Due to the availability of frequent bus services, and active travel links, key services are readily available to access for any residents within Ystradowen without the need to travel by car. The site is within a maximum 9- and 14-minute bus journey (respectively) of the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Accordingly, the settlement of Ystradowen represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ystradowen, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.
As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 "For the purposes of this policy, 'small-scale' will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."
The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.
SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

Deliverability of the Site

In summary, the site seeks to deliver the following key elements:

• Provision of circa 67 new-build residential dwellings (including 50% affordable housing provision);
• A mix of house-types and tenures across the site to cater for a variety of needs;
• Creation of a new primary access into the site;
• Connection to pedestrian links within the wider area;
• Public open space; and
• Green Infrastructure; and
SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

Land at Ystradowen (Site ID: 4060)

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site. The 'Candidate Sites Assessment Deposit Plan Stage v2' for 'Land at Ystradowen (Site ID: 4060)' sets out that the position of the site at the Deposit Stage is as follows:

"Amendment of proposed use from housing to affordable housing led. Previous site reference 430. The original assessment concluded that whilst the site was adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.
The LDP site in question has subsequently been granted planning permission for housing. This site will serve the future needs of residents in the area and it is not considered that additional land should be allocated in this location."

In terms of the first paragraph, the assessment/conclusion implies and suggests that 'Land at Ystradowen' (4060)' does not adjoin the existing LDP settlement boundary as the allocated site ('Land off Sandy Lane, Ystradowen') has not been built out – "by virtue of an existing adopted plan LDP allocation this is currently under review". Detailed representations have been made and submitted previously at the Housing Trajectory (see Appendix B& C) that outlines that this is fundamentally incorrect. This is not repeated in full here, with just the main points re-iterated.

First and foremost, 'Land at Ystradowen (4060)' directly adjoins the existing LDP settlement boundary. Secondly, there has been a significant change in the position and circumstances. The allocated site ('Land off Sandy Lane, Ystradowen') is currently being "built out", with work commencing on site (see photographic evidence in Appendix C)
- post the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024).
Accordingly, the site no longer adjoins "the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review". Given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.

With regards to the second paragraph, the assessment/conclusion outlines that "The LDP site … will serve the future

needs of residents in the area and it is not considered that additional land should be allocated in this location". The arguments and case presented in Appendix B & C. There is a clear overreliance on 'rolled forward' sites / existing allocated sites. A total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%). We believe that a greater level of growth is achievable and should be considered. Not least as there is an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings). As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy. Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply. The "future needs of residents in the area" will therefore not be met/served by just this site, and it is considered that additional land should be allocated in this location.

Furthermore, to reinforce, illustrate, and evidence the point in specific reference to the site the subject to this representation (located in Ystradowen), reference is made to application ref. 2013/00856/OUT – 'Land off Badgers Brook Rise, Ystradowen'. The Final Report of the application states that "Ystradowen is considered a sustainable settlement for further housing development" – i.e. "additional land should be allocated in this location".

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan (see Appendix B), a similar 'scoring' exercise has been undertaken as part evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage can be seen below for reference:
BP18 Candidate Ste Assessment at Preferred Strategy Stage
As demonstrated above, there has been a positive change to the scoring attributed to the site ('Land at Ystradowen'). The change is a positive change to the 'Infrastructure Availability' section changing from: 'Grey' (no score) to 'Amber'. Infrastructure Availability is outlined as: "Existing or proposed services would be suitable subject to local improvements without impacting on development viability and/or delivery timescales" (see below):
The explanation for the scoring provided by the Vale sets out that "Sites will be assessed against the availability of water connections to the site, in addition to the method of foul sewage disposal from the site. Consultation shall be undertaken with DCWW to determine whether there is sufficient capacity to the wastewater treatments works, and how it links into DCWW's Capital Investment Programme.
Where consultation indicates limited capacity, or the site is located away from a viable connection this may impact on the deliverability/viability of a site should this require significant connection costs or upgrades. Consequently, the Council shall require site proposers to undertake detailed site viability assessment to determine the impact that additional cost shall have on development cost and deliverability timescales."

As set out above, this is a positive change. This is most likely derived from the allocated site ('Land off Sandy Lane, Ystradowen') currently being "built out", with work commencing on site that would facilitate and improve the 'Infrastructure Availability'. This re-iterates the point made previously re the incorrect assessment reached, and the ever changing position of this site – which will only improve given the neighbouring allocated site ('Land off Sandy Lane, Ystradowen') being "built out".

Land West of Maendy Road, Aberthin (Site ID: 2299)

There are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and the site the subject of these representations. It is therefore considered pertinent to assess and compare the suitability of 'Land West of Maendy Road, Aberthin'. Not least as 'Land at Ystradowen (Site ID: 4060)' is for a "small-scale affordable housing led development in a minor rural settlement", within "the ward of Cowbridge".

The site 'Land West of Maendy Road (Site ID: 2299)' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however from our review of the evidence base submitted as part of the Housing Trajectory consultation, there was no assessment and critique of this site at this stage. This raises questions regarding the "soundness" of this site, given it appears this sites acceptability and inclusion was pre-determined.

The site ('Land West of Maendy Road') has since had a detailed assessment and critique published, however concerns still remain regarding the "soundness" of the site which forms part of the intended housing land supply. The 'Stage 2 Detailed Site Assessment' summary undertaken for 'Land West of Maendy Road' has been extracted below:

"The site is proposed for a small-scale affordable housing led development in a minor rural settlement, which would accord in principle with the strategy. Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent.
The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that."

As mentioned previously, there are material similarities between 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)' (the subject of these representations). Firstly 'Land at Ystradowen (Site ID: 4060)' is also for a "small-scale affordable housing led development", that is "in a minor rural settlement" (Ystradowen). Accordingly, it should follow that as 'Land West of Maendy Road, Aberthin (Site ID: 2299)' "would accord in principle with the strategy", 'Land at Ystradowen (Site ID: 4060)' would also "accord in principle with the strategy".

Furthermore, there is no material difference between the following assessment of Aberthin and Ystradowen:

"Aberthin itself has limited services and facilities, but is within reasonable walking distance of primary and secondary school provision with the wider range of services and facilities in Cowbridge just over 2000m away. The settlement is also served by public transport, although this is relatively infrequent."

There is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms.

As set out in our representations to the Preferred Strategy, we reviewed the key services in proximity to the site. The following services were identified as part of that review:

• In terms of public transport, there are two bus stops located approximately 0.2 miles (4-minute walk) from the site ('Land West of Maendy Road'), with the 321 providing services between Llantwit Major and Talbot Green;

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin;

• The site is also located 0.2 miles (4-minute walk) from The Farmers Arms Pub and 0.2 miles (4-minute walk) from The Hare and Hounds Inn; and

• The site is located 0.2 miles (5-minute walk) from Aberthin Village Hall.

Given the above, "The settlement (Ystradowen) is also served by public transport".
Furthermore, Ystradowen is located only 2.7 miles from Cowbridge (9-minute bus journey). The "primary and secondary school provision with the wider range of services and facilities in Cowbridge" mentioned in relation to Aberthin are therefore also in close proximity to Ystradowen.

Given the above, any candidate site at 'Land at Ystradowen' (the subject of these representations – Site ID: 430 / 4060) is no less sustainable than the site at Aberthin (Site ID: 2299).

Not least as the following additional key services are located within Ystradowen and therefore in close proximity to the promoted site:

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'; and
• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Furthermore it is important to note that the above scoring criteria is very limiting, and does not take into account the important role and proximity of settlements in a wider context. For example, it does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant) – see Appendix B for full details.

In addition, as set out within the representations made in relation to the House Trajectory (Appendix C), the following extracts have been taken from the Officer's Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:
As set out above, it is important to note that the Final Report of application ref. 2013/00856/OUT states that "Ystradowen is considered a sustainable settlement for further housing development", due to "the sustainable nature of the settlement". Furthermore, the Final Report of app ref. 2023/00948/FUL states:

• "Notwithstanding this, the site is located in close proximity to local services and there is a bus stop located nearby. Whilst the comments relating to the reliance and frequency of the bus services have been considered, there still remains a bus service in the area"; and
• "Firstly, as aforementioned, many neighbouring comments refer to the site as unsustainable and have commented on the suitability of public transport and cycle routes etc. This has been addressed above."

The above clearly evidences that the location has previously been endorsed as, and is currently still found to be, sustainable.

Accordingly, it can be considered therefore that if the proposed allocated site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen (Site ID: 430 / 4060)' is equally suitable to be an Affordable Housing Led Allocation.

The second section/paragraph of the assessment states:

"The 2023 LHMA indicated that the ward of Cowbridge has a need for 230 additional affordable units over the next 15 years and this site could make an important contribution in meeting that."
'Land at Ystradowen (Site ID: 4060)' is also located within "the ward of Cowbridge". As per the above and outlined by the Authority, there is "a need for 230 additional affordable units over the next 15 years". It is clear therefore that there is a need for additional affordable units in this ward, and this site would therefore also help to alleviate this need.

This position is a direct contradiction of course of the assessment/conclusion for 'Land at Ystradowen (Site ID: 4060)' which stated "it is not considered that additional land should be allocated in this location". It is clear from the above however that "additional land should be allocated in this location" to satisfy this "need for 230 additional affordable units over the next 15 years" – which 'Land at Ystradowen (Site ID: 4060)' can do. This is not least the case given the detailed arguments, case and representations presented and evidenced previously above and in Appendix B & C.
To briefly reiterate there is a clear overreliance on 'rolled forward' sites / existing allocated sites which has resulted in the unmet need deriving from the existing LDP being still present. A greater level of provision for new allocations should therefore be applied in order to meet the housing requirement. The provision of housing should be adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply, so these can "make an important contribution in meeting" the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" – which 'Land at Ystradowen (Site ID: 4060)' can do.

As set out within the representations made in relation to the housing trajectory (see Appendix C), a further key consideration to note and one which does differentiate between the relative merits of the 'Land at Maendy Road, Aberthin' and 'Land at Ystradowen' is that the LDP Proposals Map demonstrates that 'Land West of Maendy Road' is within a Special Landscape Area - see below:
Vale of Glamorgan Proposals Map (Land West of Maendy Road outlined in red
Under Policy MG17 'Special Landscape Areas' it is considered that development in SLA could pose an "unacceptable harm to the important landscape of the area". Accordingly, this development and proposed allocation could therefore cause "unacceptable harm to the important landscape of the area".

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any "unacceptable harm to the important landscape of the area".
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)
It is noted that the detailed assessment scores the site 'amber' in respect to Special Landscape Area (refer to / see later section for full details), with the assessment methodology setting out that "the site is located within a Special Landscape Area/The Glamorgan Heritage Coast and the development may result in little or no change in character and little or no significant effect on landscape character and visual amenity."
A detailed assessment of the impact upon the SLA in respect to the development of 'Land West of Maendy Road, Aberthin' should therefore be, and will need to be, undertaken as part of any planning application. If it is found that the site causes "unacceptable harm to the important landscape of the area", this will lead to this proposed allocation being at risk of not being delivered. This will be as a result of its impacts and acceptability at the planning application stage that the landscape and visual impact of development of the site is unacceptable. As such, these proposed affordable units are at a potential considerable risk of being lost and not satisfying the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" – which 'Land at Ystradowen (Site ID: 4060)' can do as it is not located in an SLA.

In addition the draft housing trajectory set out that "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" is not provided for. This is clearly an issue. Given however 'Land at Ystradowen' does not sit within a SLA – and so not pose any potential concern or cause any "unacceptable harm to the important landscape of the area" – the allocation of this site would be more suitable and "safer" - as there would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for, and the need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge" would be satisfied.

As mentioned previously, a detailed assessment and critique has now been undertaken of 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part evidence base for the Deposit Plan using the similar 'scoring' exercise. As such, it is again pertinent to consider and respond to the Council's 'scoring' exercise assessment of the site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' as part of these representations.

The 'Summary of Assessment of New Candidate Sites' table can be seen overleaf for reference:
BP18A Candidate Site Assessment at Deposit Plan Stage
A comparison between the site assessments undertaken for both 'Land West of Maendy Road, Aberthin (Site ID: 2299)' (on the left), and 'Land at Ystradowen (Site ID: 4060)' (on the right) has been undertaken, and can be seen below for reference:

Having undertaken a review of the scoring for both 'Land West of Maendy Road, Aberthin (Site ID: 2299)' and 'Land at Ystradowen (Site ID: 4060)', it is clear that 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)':

• 'Land at Ystradowen (Site ID: 4060)': 17/33 criteria are scored green = 52%

• 'Land West of Maendy Road, Aberthin (Site ID: 2299)': 12/34 criteria are scored green = 36%

It is clear therefore given the above that 'Land at Ystradowen (Site ID: 4060)' is a better site, and should be allocated accordingly.

One key example to note is how the criterion 'Access to Services and Facilities' has been scored. For 'Land at Ystradowen (Site ID: 4060)' this has been scored green, yet for 'Land West of Maendy Road, Aberthin (Site ID: 2299)', this has been scored red. Given this, this corroborates the position outlined previously above that, if the proposed allocated site 'Land West of Maendy Road, Aberthin (Site ID: 2299)' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen (Site ID: 430 / 4060)' is equally as sustainable – in fact considered more suitable (given its higher scoring in this respect).

Furthermore, we question the "soundness" of the assessment of 'Land West of Maendy Road, Aberthin (Site ID: 2299)', given that 7/34 (21%) of the criteria do not appears to have not been assessed – i.e. 7/34 (21%) of the criteria are scored grey. This raises questions regarding the "soundness" of this site, given it appears this sites acceptability and inclusion was pre-determined.

It is clear therefore that if 'Land West of Maendy Road, Aberthin (Site ID: 2299)' has been deemed acceptable for allocation, yet 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than this site, 'Land at Ystradowen (Site ID: 4060)' should also be deemed acceptable and be allocated. Not least as the site is "proposed for a small-scale affordable housing led development in a minor rural settlement … would accord in principle with the strategy", and "could make an important contribution in meeting "a "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge".

Summary and Conclusion

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Deposit Plan published as part of the consultation.

In terms of SECTION 4, and a response to the Candidate Site Assessment at Deposit Plan Stage, the following key points have been made:

• The Council's 'Stage 2 Detailed Site Assessment' justification for 'Land at Ystradowen (Site ID: 4060)' is fundamentally incorrect;

• Given the material positive similarities between 'Land at Ystradowen (Site ID: 4060)' and 'Land West of Maendy Road, Aberthin (Site ID: 2299)', which has been deemed acceptable and allocated, 'Land at Ystradowen (Site ID: 4060)' should also be deemed acceptable and allocated accordingly;

• 'Land at Ystradowen (Site ID: 4060)' would help to alleviate and satisfy "a need for 230 additional affordable units over the next 15 years" within "the ward of Cowbridge"; and
• 'Land at Ystradowen (Site ID: 4060)' scores higher/more positively (i.e. green) than 'Land West of Maendy Road, Aberthin (Site ID: 2299)', and so should also be deemed acceptable and be allocated;

Ultimately, 'Land at Ystradowen (Site ID: 4060)' is "proposed for a small-scale affordable housing led development in a minor rural settlement", and as such "would accord in principle with the strategy". It would therefore "make an important contribution in meeting" the "need for 230 additional affordable units over the next 15 years" in "the ward of Cowbridge".

We would therefore object the Council's assessment that the site is not considered suitable for development.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Credentials of this site subject to this submission; and
10. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing-led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the east of Coliwinston, Colwinston.

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• “Time period of pre-application discussions/PAC consultation” = 4 months
• “Time between submission of planning application and determination” = 6 months
• “Time taken from planning consent to the discharge of relevant conditions to enable site construction” = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of “6 months” given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within “4 months” as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicted in the ‘Timing and Phasing of Sites’ table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.
Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large ‘spike’ (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.
The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren’t spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.
Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.
Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:
Table 6: Existing LDP allocations to be carried forward
The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.
Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely

that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision.
Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".
As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision, and as such, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations

Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:
Candidate Site Stage 2 Assessment (Site Ref. 404)
The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clearly evident deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Despite the absence of site-specific assessment criteria, as the RLDP preferred strategy states a key objective guiding site selection is that the Plan will "provide for vital and vibrant rural communities whilst protecting the countryside through the delivery of growth in sustainable locations related to the settlement hierarchy alongside the provision of supporting infrastructure" (Objective 7 'Fostering Diverse Vibrant and Connected Communities'), it is reasonable to assume that the Council considers 'Land West of Maendy Road' to be a 'sustainable' location.

Given this, we have reviewed the key services in proximity to the site. The following services were identified:

• In terms of public transport, there are two bus stops located approximately 0.2 miles (4-minute walk) from the site ('Land West of Maendy Road'), with the 321 providing services between Llantwit Major and Talbot Green.

• The site is also located 0.2 miles (4-minute walk) from The Farmers Arms Pub and 0.2 miles (4-minute walk) from The Hare and Hounds Inn.

• The site is located 0.2 miles (5-minute walk) from Aberthin Village Hall.

Aberthin is in close proximity (1.2 miles/14-minute walk) to the key settlement of Cowbridge - which is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Considering this, there is no material difference between 'Land West of Maendy Road' and 'Land at Ystradowen' in sustainability terms. Given that Ystradowen is located only 2.7 miles from Cowbridge (9- minute bus journey), the candidate site at 'Land at Ystradowen' is no less sustainable than the site at Aberthin. The following key services are within Ystradowen and therefore in close proximity to the promoted site:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green. The 321 service is the same bus service that serves 'Land West of Maendy Road' / Aberthin.
• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

Accordingly, it can be considered therefore that if the proposed allocated site 'Land West of Maendy Road, Aberthin' is considered sustainable and by association suitable to be an Affordable Housing Led Allocation, 'Land at Ystradowen' is equally suitable to be an Affordable Housing Led Allocation.
Furthermore, to reinforce the above position and to illustrate and evidence the site's sustainability, the following has been taken from the Officer's Reports associated with the applications for the site that directly adjoins the western boundary of the promoted site 430 - 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48). An aerial view extract is outlined below to give spatial context:
Reference is made in the Final Report of app ref. 2013/00856/OUT which states that "Ystradowen is considered a sustainable settlement for further housing development", due to "the sustainable nature of the settlement".

Furthermore, the Final Report of app ref. 2023/00948/FUL states:

• "Notwithstanding this, the site is located in close proximity to local services and there is a bus stop located nearby. Whilst the comments relating to the reliance and frequency of the bus services have been considered, there still remains a bus service in the area."
• "Firstly, as aforementioned, many neighbouring comments refer to the site as unsustainable and have commented on the suitability of public transport and cycle routes etc. This has been addressed above."

The above clearly evidences that the location has previously been endorsed as, and is currently still found to be, sustainable.

A further key consideration to note and one which does differentiate between the relative merits of the 'Land at Maendy Road, Aberthin' and 'Land at Ystradowen' is that the LDP Proposals Map demonstrates that 'Land West of Maendy Road' is within a Special Landscape Area - see overleaf:
Vale of Glamorgan Proposals Map (Land West of Maendy Road outlined in red)
Under Policy MG17 'Special Landscape Areas' it is considered that development in SLA could pose an "unacceptable harm to the important landscape of the area". Accordingly, this development and proposed allocation could therefore cause "unacceptable harm to the important landscape of the area".

'Land at Ystradowen' by contrast does not sit within a SLA (see below). This site would therefore not pose any potential concern in this respect as it would ultimately not cause any "unacceptable harm to the important landscape of the area".
Vale of Glamorgan Proposals Map (Land at Ystradowen in red)

This is a significant factor to consider. 'Land West of Maendy Road, Aberthin' causing "unacceptable harm to the important landscape of the area" will lead to this proposed allocation being at risk of not being delivered by virtue of detailed assessments of its impacts and acceptability at planning application stage holding that the landscape and visual impact of development of the site is unacceptable. As such 25 affordable units will be lost from the proposed affordable 122 units, and ultimately being lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is not delivered (as it is located in a SLA), and so a "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" is not provided for. This is clearly an issue. Given however 'Land at Ystradowen' does not sit within a SLA – and so not pose any potential concern or cause any "unacceptable harm to the important landscape of the area" – the allocation of this site would be more suitable and "safer" - as therefore would be no concerns over this proposed allocation being removed and/or not being delivered in this respect (as it is not located in a SLA). This would ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.
Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)
As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:
Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development

must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:
In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Ystradowen', the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below. With reference to the above:

• In terms of public transport, there are two bus stops located approximately 400m (7-minute walk) from the site ('Ty Mawr Close'), with the '321 Nat Group Service' providing services between Llantwit Major and Talbot Green.

• The site is also located 300m (3-minute walk) and 600m (10-minute walk) from Sports Pitches/Playing Fields such as 'Ystradowen Children's Park', and the 3/4G Sports Pitch at 'Ystradowen Petanque Club'.

• Furthermore, the site is located 480m (7-minute walk) from the 'Murco – Tudor Garage' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities.

Furthermore, the settlement of Ystradowen has been ranked highly in the VoG Sustainable Settlements Appraisal, scoring a total of 14 points according to the distance to key services and facilities available. This places Ystradowen 26th out of a total of 87 settlements. As a result, this would be deemed a suitable area to accommodate growth.

As stated above the key settlement of Cowbridge is located in close proximity being only 2.7 miles to the south and a 9-minute bus journey. Cowbridge is identified as a sustainable location, and is ranked 4th place for services and facilities within the Vale of Glamorgan. The following key services are found in Cowbridge, and are therefore in close proximity to 'Land West of Maendy Road':

• Cowbridge Comprehensive Schools;
• Cowbridge Health Centre; and
• Cowbridge Town Centre for various Retail Services.

Furthermore, it is important to note that the above criteria does not take into account the important role and proximity of the Principal Settlement and Strategic Growth Area (as defined in the RCTCBC LDP) of Talbot Green / Pontyclun / Llantrisant which is 2.8 miles to the north (14-minute bus journey). Ystradowen would also naturally align, and function, in association with this Principal Settlement and Strategic Growth Area (of Talbot Green / Pontyclun / Llantrisant). These areas comprise for example the following key services:

• Cowbridge and 'Y Pant' Comprehensive Schools;
• Cowbridge Health Centre and Old School Surgery; and
• Cowbridge Town Centre, and Talbot Green / Pontyclun / Llantrisant (Strategic Growth Area), for various Retail Services.

Given the above, 'Land at Ystradowen' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Ystradowen' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.
Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref. 2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.
Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ystradowen.
Credentials of this site subject to this submission

There has been a significant change in the position and circumstances since the promoted site herein was assessed at Candidate Site Stage and the Assessment undertaken. The Stage 2 Assessment of the site concluded the following: 'Whilst adjoining the existing LDP settlement boundary this is by virtue of an existing adopted plan LDP allocation this is currently under review. Notwithstanding this the site would represent unacceptable intrusion in to the open countryside.' The assessment/conclusion implies that as this site ('Land off Sandy Lane, Ystradowen') has not been built out and is "currently under review", it suggests that 'Land at Ystradowen' (430) does not adjoin the existing LDP settlement boundary. Given recent developments however associated with the implementation of the planning permission ref. 2023/00948/FUL (post approval on 9th December 2024) and the site being currently being "built out" and work commencing on site, the site no longer adjoins "the existing LDP settlement boundary … by virtue of an existing adopted plan LDP allocation … currently under review". Accordingly, and given this, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the LDP settlement boundary and the site promoted herein.
The following specific photo evidences 'Land off Sandy Lane, Ystradowen' (Housing Allocation 48) is being built out the western boundary of the promoted Site ID 430. This therefore clearly highlights that the site's boundary is representing the existing settlement limit in the existing development plan. Accordingly, the 'Land at Ystradowen' site boundary therefore directly adjoins/is adjoining the existing LDP settlement boundary.
Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gr
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3gt
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g4
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3g7
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3g8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gv
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3gc

7147 Object

Document Element: St Athan Transport
Respondent: Peter Stone Properties Ltd [1182]
Agent: Geraint John Planning Ltd

Summary:

It is now the case that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport for Wales. This paper acknowledges that a new railway station at St Athan would represent a longer-term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £800,000 over the last 12 months, there is a clear and established need for new homes in the Bonvilston area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the

Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either a Key Settlement, Service Centre Settlement or Primary Settlement, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Bonvilston. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and promote the use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to

address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed

allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling

approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites – not least given that 3 of the 4 allocated affordable housing-led sites are located west of Cowbridge.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that Land South of A48, Bonvilston (Site ID: 435 / 3857) should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area (which Bonvilston is located within), and a need for 242 affordable homes in the Wenvoe housing market area. As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

Securing further delivery of Affordable Units

As set out above, it can be assumed that the affordable housing-led allocated sites only provide 61no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included

within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to meet the target.
Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Bonvilston and the proposed site. As outlined within these representations, it is considered that the site (ID 435 / 3857) represents a sustainable, deliverable and acceptable site. This proposed allocation is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

- Cowbridge Comprehensive School;
- St Nicholas Primary School;
- Cowbridge Health Centre; and
- Cowbridge town centre for various Retail Services.

Accordingly, the settlement of Bonvilston represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Bonvilston, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 "For the purposes of this policy, 'small-scale' will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites

with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

Deliverability of the Site

In summary, the site seeks to deliver the following key elements:

• In summary, the opportunity of the site seeks to deliver:
• Residential development comprising up to 25 dwellings, with at least 50% affordable housing in accordance with Policy SP2,
• Highways infrastructure within the site;
• Upgraded access to the site;
• Strong legible pedestrian and cycle connections throughout the site and with the existing settlement;
• Green Infrastructure; and
• Sustainable Drainage Systems (SuDS).

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;

• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land South of the A48, Bonvilston (Site ID: 3857) sets out that the position of the site at the Deposit Stage is as follows:

"Notwithstanding the amendment from a market led to an affordable housing led scheme (original CS 435), the other reasons why the site was previously discounted still remain.
The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area.
Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48.
The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable. There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing."
Conservation Area
In terms of the assertion that "The development would have an adverse impact on the character and setting of the Bonvilston Conservation Area, this is strongly disputed.

Whilst it is acknowledged that the site lies within the Bonvilston Conservation Area, the conclusion that it would be adversely affected is not considered to be accurate. Firstly, the site as it currently stands, consists of an open field. This does not match the conservation area which is characterised primarily by residential dwellings of varying densities, and as such, it is considered that development of the site with sensitively designed buildings would enhance as opposed to harming its surroundings.

Secondly, the large residential development to the north of the site, 'Land at Sycamore Cross' ref. 2015/00960/FUL encroaches on the Bonvilston Conservation area but was deemed acceptable by the LPA. Although not all of the site is within the Conservation Area, it's encroachment and presence adjoining and surrounding a large proportion of the area is considerable and was deemed acceptable by Officers in 2017. Given this, a development at the Land South of the A48 should be deemed acceptable, as it follows the same principles albeit at a much smaller scale.

Highways
As for the statement that "Development of the site would require major highway mitigation works to enable safe vehicular access on to the A48", this is also strongly disputed.

The site is located immediately adjacent to the adopted highway where it is proposed to upgrade and enhance the existing gated access point. Due to the existing access point, it is not considered that 'major' highway mitigation works would be needed, rather this would be enhanced and improved as part of the proposed development. Furthermore, given the nature of the road, with long views extending in both directions, it is anticipated that appropriate visibility

splays could be achieved to enable safe access and egress. As such, it is considered that the site would achieve appropriate highway access within the need for "major" highway mitigation works.

Agricultural Land Classification
The Detailed Site Assessment also sets out that "The Predictive ALC Maps indicates that site is Grade 2 Best and Most Versatile Land. Development of the site would lead to the loss of BMV land. BMV land should only be developed if there is an overriding need for the development and either previously developed land or land is lower agricultural grades is unavailable." This is strongly disputed.

A review of the Agricultural Land Classification Predictive Map indicates that the site lies primarily within 'Grade 2: Very good quality agricultural land' but no Grade 1 land is present. Further assessment and tests to establish the quality would therefore be undertaken in due course to confirm the quality of the land. However, it is not considered that it would be suitable to farm in any event given the location immediately adjoining existing residential development and the fact that it is within private ownership. Overall, given that the site is relatively small with a gross area of 0.88 hectares, it is not considered that its development would result in a detrimental or significant loss of agricultural land – not least given that site is not capable of beneficial agricultural production due to its limited size.

Housing / Housing Land
Further to the above, it is also set out that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing", however, this is not considered to be entirely accurate.

The LHMA 2023 shows that there is a need for 77 affordable homes in the St Nicholas & Llancarfan housing market area and a need for 242 affordable homes in the Wenvoe housing market area. This need has not been met through the allocations of sites within the RLDP, nor has it been met through outstanding commitments.

As outlined in Annex 1, it can be assumed that the affordable housing-led allocated sites will only provide for 61no. affordable dwellings within the Rural Vale, comprising 4no. sites that are expected to deliver approximately 20 – 50 dwellings (including both affordable and market housing). However, the RLDP sets a target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4% of the target provision and will only make provision for 2% of the targeted number. Therefore, more sites should be allocated in order to secure the delivery of a higher number of affordable housing units to meet the target.

As set out within Annex 1, it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, however, there is serious concern regarding the deliverability of these sites, which would result in a significant gap in the total affordable housing that is delivered. Therefore, allocating a greater number of affordable housing-led sites would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in the both the overall affordable housing need, and the need for the St Nicholas & Llancarfan housing market area, being unmet, with demand continuing to outstrip supply.

The LHMA 2023 sets out the existing stock and planned supply of affordable housing over the next 5 years (up until 2028). This assessment found that the housing market area of St Nicholas & Llancarfan has a committed supply of 4no. one beds, 11no. two beds, and 3no. three beds, with 2 no. three beds as expected re-lets. The assessment also identifies a committed supply of 39no. units for intermediate housing.

The LHMA also sets out the existing stock and planned supply for Wenvoe, identifying the committed supply of social rent homes to be 12no. one beds, 11no. two beds, and 5no. three beds, with 7no. one beds and 8no. two beds as expected re-lets. There is no committed supply for intermediate housing in Wenvoe.

It should be noted that the development of 'Land East of Nicholas' (Campbell Court and Cae Newydd), has now been completed, and as such, can not form part of the housing land available. The latest Pre-Application Response for the site subject to these representations (Land South of the A48, Bonvilston) accounted for the development of the site in

St Nicholas, stating that "even after the developments at St Nicholas and Culverhouse Cross, there was the need in the Wenvoe ward for 1 Bed 71, 2 Bed 49, 3 Bed 29, 4 Bed 7, 5 Bed 5, Total 161".

It should also be noted that there are existing commitments within the Bonvilston area ('Land to the east of Bonvilston'), however, the deliverability of the existing commitment is seriously questioned. Application Ref. 2015/00960/FUL was approved in July 2017, with the Housing Land Supply and Housing Trajectory Report (December 2025) confirming that of the total 120 units permitted, only 40 had completed by 1st April 2025, with the remaining 80 units not started by this same date. Of the 80 units not started, 25 units are affordable homes.

It is well known that phase 1 of the development at 'Land to the east of Bonvilston' has faced difficulties which has led to the development remaining incomplete. This does of course put into question the overall deliverability of the site, and raises concerns about the units that were, and still are, required within the Bonvilston area.

The allocation of the site promoted herein would not only help in the short term in meeting the overall affordable housing target for the Plan, but would also assist in meeting the unmet needs of affordable housing within Bonvilston – not least given the serious concern regarding the deliverability of the committed supply of housing within the St Nicholas & Llancarfan housing market area.

For the reasons set out above, and in light of the information provided within the LHMA 2023 and the Housing Land Supply and Housing Trajectory Report (December 2025), it is evident that there is considerable need for affordable housing within Bonvilston, and accordingly, the housing market areas of St Nicholas & Llancarfan, and Wenvoe. There have not been any sites allocated to assist within meeting the local need, and more sites should be allocated in order to secure delivery of a higher number of affordable housing units to meet the overall target of the Plan.

The contention that "There is housing land available within the ward of St Nicholas and Llancarfan that can support the delivery of affordable housing" is therefore strongly disputed – not least given that there is a clear and evident need to allocate more affordable housing-led sites in order to meet the target set out in the Plan.

Interim Summary

In summary, it is considered that the site subject to these representations would not have an adverse impact on the character and setting of the Bonvilston Conservation Area, nor would major highway mitigation works be required to enable safe vehicular access on to the A48. Moreover, it is considered that the site's classification as BMV Agricultural Land does not pose a fundamental constraint to development – as the site represents a relatively small parcel with a gross area of 0.88 hectares, which is not capable of beneficial agricultural production due to its limited size.

There is also a considerable need for the affordable housing in Bonvilston and the housing market area of St Nicholas & Llancarfan. The site promoted herein would assist in meeting these local needs and should be allocated accordingly.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage

As demonstrated above, there has only been one change to the scoring attributed to the site, this being a change from 'red' to 'amber' for 'Developer Interest'. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with these representations accordingly (see Appendix B).

Whilst detailed submissions were made on the previous assessment, it is considered pertinent for the scoring of the key criteria's to be addressed as part of these representations. As such, these have also been discussed below.
Developer Interest

As set out above, the Detailed Site Assessment for 'Developer Interest' has changed from 'red' to 'amber'. The assessment methodology for this section of the assessment has been extracted below for reference.

As set out above, 'amber' refers to there being no development interest identified at this stage, however, there is evidence to indicate that the site is being actively promoted by the owners.

The representations made to the Preferred Strategy (Appendix B) sets out that whilst the site does not yet have an agreement with a developer to take on the land, it is considered that this would be achieved should the site be allocated, and planning permission granted. Newydd Housing association have been engaged previously and had agreed to take the site forward as a 100% affordable scheme, albeit is also considered that they could take on the affordable units as part of a mixed tenure scheme.

In addition to Newydd, the site promoter has also received an offer from a private social housing provider who would be prepared to support the site as a mixed tenure scheme.

This position has not changed since the Preferred Strategy stage, and is considered that there is continued developer interest for the site. This is not considered to change at any point – not least given the discussions held between the owners of the site in questions and developers of interest.

Environmental and Physical Constraints

As set out at the Pre-Application Stage. the site underwent a Preliminary Ecological Appraisal in September 2022 which identified that whilst some precautionary measures were recommended in terms of protecting priority habitats and reptiles, the site is not fundamentally constrained from development on ecological terms. Given this, it is considered that further ecological surveys would be undertaken at the planning stage to inform any development proposals and ensure the safeguarding of the natural environment.

Access to Key Services (Retail, Primary Schools, and Health Services) and to Services and Facilities

As set out within the representations made to the Preferred Strategy, the site is located within a maximum of a 20-minute bus journey to a version of every key service listed, due to the proximity of the site to settlements such as Cowbridge, Culverhouse Cross and St Nicholas. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Bonvilston without the need to travel by car.

To reiterate, the site 'Land South of the A48, Bonvilston' is situated in proximity to Cowbridge, Culverhouse Cross and Cardiff, which comprise all key services. Concluding this allocation as 'unsustainable' in regard to 'availability of local facilities in and around settlements' is not accurate. Given that the site is located within 4 miles of both Cowbridge and St Nicholas, the site is within a maximum 20-minute bus journey of the following key services:

• Cowbridge Comprehensive School;
• St Nicholas Primary School;
• Cowbridge Health Centre; and
• Cowbridge town centre for various Retail Services.

It should also be noted that Bonvilston contains a number of facilities within a short and level walking distance of the site, including the village shop and Café, as well as the Red Lion Public House.

Given the accessibility of the site to other settlements, and the fact that these are made accessible by bus and active travel routes, it is considered that the site should be concluded as sustainable in regard to access to key services.

Summary and Conclusion

As evidenced above, and within the representations made to the Preferred Strategy (Appendix B), there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location, and site, are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations

• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston.

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing

Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicated in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• “A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training”.

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for ‘rolled forward’ LDP sites, which contribute to the total of ‘Proposed Additional Housing Allocations’ forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that “there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered.” The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan’s strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ‘‘soundness’’, and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.

Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the ‘key sites’ to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above the site was not considered suitable for further consideration with the site scoring negatively (red) in a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and
• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately

will be lost from the overall housing land supply. As stated in the draft housing trajectory “there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities”. There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A “small scale

affordable housing led development” which is needed to “respond to local affordable needs and help sustain services and facilities within these rural communities” will therefore not be provided for. This is clearly an issue.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above the site was rejected and considered not suitable for further consideration. In fact, and unlike ‘Land at Heol Fain, Wick’ and ‘Land to north and west of Westwinds Business Park’ it was stated that this site “could not be considered as a suitable affordable housing led development site”. Despite this, this site has been outlined as an Affordable Housing Led Allocation. As such, the inclusion of this site is “unsound”.

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Land South of A48, Bonvilston.

Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it’s consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3jp
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3kr
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k3
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3k6
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kf
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3kh
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z5

7166 Object

Document Element: St Athan Transport
Respondent: Wig Fach Property Company Ltd [2373]
Agent: Geraint John Planning Ltd

Summary:
It is now the case that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport for Wales. This paper acknowledges that a new railway station at St Athan would represent a longer-term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations.

Full text:
ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ogmore By Sea area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve,

paragraph 6.132 of the Deposit Plan outlines the following:

“Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided.”

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision’s clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either Key Settlement, Service Centre settlement or Primary Settlements, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Ogmore By Sea. The Vale is characteristically ‘rural’, and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the “soundness” of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states “The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities”. The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of ‘key sites’ to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a

risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of

completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required

that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as

affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that the should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 124 affordable homes in the St Brides Major local housing market area (which Ogmore is located within). As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

It is questionable whether Wick has the capacity to accommodate 50 new dwellings, given the sustainability and rural nature of the area. As a result, it is suggested that the number of homes allocated in Wick is reduced and that a further allocation in St Brides Major is secured, in order to facilitate supporting the delivery of affordable housing through the housing market area, rather than in one minor rural settlement. The sustainability of Ogmore has been assessed, both by the Council through the Sustainability Appraisal and again, through our assessment of the site.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a

target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4 % of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.

Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ogmore and the proposed site. As outlined within these representations, it is considered that the site (ID xxx) represents a sustainable, deliverable and acceptable site. The site is within a maximum of a 22- minute bus journey to a every key service listed, due to the proximity of the site to settlements such as Bridgend. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Ogmore By Sea without the need to travel by car. The site is located within 5 miles of Bridgend, and within a maximum 22-minute bus journey of the following services:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre for various Retail Services

Moreover, Ogmore has benefitted from the recent development of the Ogmore By Sea Village Hall, which provides space for community activities and events to take place. The hall also includes a coffee shop (Welsh Coffee Company), which only adds further to the daily services provision available within the settlement. Access to the hall and coffee shop is directly provided for pedestrians from the Main Road, which allows for direct access from the site.

Accordingly, the settlement of Ogmore represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

It is acknowledged that the site also lies within the Glamorgan Heritage Coast and this point is addressed further below.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ogmore By Sea, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a 'cap' of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a 'cap' limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 "For the purposes of this policy, 'small-scale' will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

Policy DNP3 – Glamorgan Heritage Coast

Given that the site is located in the Glamorgan Heritage Coast, it is noted that the following policy is of relevance to any future development on the site. Criteria 4 of Policy DNP3 states:

"The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development that accords with National Policy."
It is also noted that supporting Para 6.422 "In seeking to protect the Glamorgan Heritage Coast, the Council acknowledges that there are some built up areas within the boundary, including the Minor Rural Settlement of Ogmore. In addition, the Vale of Glamorgan rail line crosses part of the Heritage Coast designation in the location where a new station at St Athan is proposed. Whilst being mindful of the need to protect the special qualities of the Glamorgan Heritage Coast, the Council accepts that development within these areas is appropriate, subject to relevant policies of the Plan"(GJP emphasis).

We would offer general support for this policy, and consider this to provide flexibility which allows for certain forms of development. However, we would suggest that the policy wording should be amended to reflect that 'housing' should be supported in the Glamorgan Heritage Coast, providing that the policy exceptions are met. Therefore, the following amendment is proposed as part of the policy should be changed to include "small scale housing" or something similar. The proposed amendments to Policy DNP3 are outlined below in red:

"The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development, including small-scale housing proposals that accords with National Policy."

Again, this would ensure that suitable housing developments can be delivered in the Plan period, to meet the housing needs of the Vale of Glamorgan – particularly in respect of affordable housing.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to Policy DNP3 – Glamorgan Heritage Coast, given the lack of recognition for the potential for small-scale housing proposals;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land at Hazelwood, Ogmore By Sea (Site ID: 3855) sets out that the position of the site at the Deposit Stage is as follows:

"The original site as ruled out as the development would represent unacceptable intrusion in to the open countryside. Whilst the site has now been identified for an affordable housing led development, the original reason for ruling it out still remains."
In terms of the assertion that "the development would represent an unacceptable intrusion into to the open countryside", this is strongly disputed, in that the development of the site would represent a natural rounding off of the existing settlement boundary. An extract of the site relative to the settlement boundary is provided below, which clearly shows that the development of the site would not extend beyond the existing settlement pattern that exists in Ogmore.

Site Outlined in Red and Settlement Shaded in Blue
As clearly demonstrated in the above mapping, the site would extend no further eastwards than the existing housing area to the south of the site. Equally, the site would not be extending any further north than the existing settlement pattern in Ogmore. This position is further supported by the wider aerial view of the site provided overleaf:

Wider Aerial View of Site Outlined in Red and Settlement Shaded in Blue

In summary, it is considered that the proposed allocation of the site represents a logical rounding off of the existing settlement, as depicted in the mapping provided above – where the site follows the existing envelope of the settlement. The site does not extend any further eastwards than the established built form located immediately to the south; indeed,

it sits comfortably within the same development line.

As such, it cannot be considered that the site represents an 'intrusion' into the countryside, as the site would be visually and functionally related to the settlement. It therefore follows that the site would be read as part of the settlement, and not the wider rural landscape.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage
As demonstrated above, there are no changes to the scoring attributed to the site. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with this submission (see Appendix A).

Sustainability

Notwithstanding the above, it is considered that the site represents a more sustainable location than what was previously assessed at Preferred Strategy stage, in light of the Ogmore by Sea Hall development. The Hall acts as a community facility, whereby the space is available for hire by local community groups such as birthday parties, weddings, group meetings, and other such similar uses. Moreover, a café (Welsh Coffee Co) is located within the premises which sells both food and drink.

The hall and café are within walking distance to and from the site, where new access facilities have been implemented from Main Road directly to the building, to allow access for pedestrians and cyclists. This is illustrated in the image below:

Walking and Cycling Facilities

The Tusker Rock pub and post office are also located along Main Road, all of which are within walking distance to the site.

Accordingly, the site is well served by new amenities (i.e. community hall) that comprehensively improves the sustainability of the site / settlement, and in turn, improves the sustainability credentials of the site promotion. It therefore follows that the site represents an acceptable location for residential development, and the site should be looked upon favourably accordingly.

It is also the case, as set out in previous representations, that the site is within a maximum 22-minuted bus journey of the following services and facilities:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre.

As such, key services and facilities can be access by sustainable travel over and above the existing level of provision available in Ogmore By Sea (as discussed above).

Accordingly, the relevant 'red' scorings in the Council's assessment should be updated to reflect the site's suitability and sustainability to accommodate the proposed residential development of the site.

Glamorgan Heritage Coast

Insofar as to the position regarding the site's location within the Glamorgan Heritage Coast, detailed submissions are made not only in the Preferred Strategy representations, but also in Annex 1 of this submission. In short, given the pressing need for such development (particularly affordable housing) to come forward in the Plan period to meet ever-increasing needs, development of this nature should be considered more favourably – not least that, as outlined in this Annex, the site would not extend any further that the existing settlement boundary.

Accordingly, the site would be perceived to form part of the settlement of Ogmore By Sea, and not the wider landscape, and therefore, would not have any detrimental impact on the Heritage Coast in any respect. The scoring should be amended accordingly to reflect this position.

Climate Change

As outlined in previous representations, the development will incorporate climate change measures, such as EV charging points, PV panels, as well as adopting sustainable materials for construction whilst maximising the potential for the dwellings to be energy efficient. Accordingly, the development will be built to high sustainable standards, and therefore, the scoring of the site should be amended as a result.

Summary and Conclusion

It has been evidenced above that there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston;

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation

with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicated in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.

Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the

housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and

• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale

affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Hazelwood, Ogmore By Sea, the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below.

With reference to the above:

• In terms of public transport, there are two bus stops located approximately 200m (3-minute walk) from the site ('Ogmore By Sea Post Office'), with the '303' providing services between Llantwit Major and Bridgend.

• The site is located 200m (3-minute walk) from the 'Ogmore By Sea Post Office' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

• The site is also located 50m (1-minute walk) from a children's park.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities. This

Furthermore, the settlement of Ogmore By Sea has been ranked higher than Llangan (which the site 'Land to north and west of Westwinds Business Park' is located within) in the VoG Sustainable Settlements Appraisal, and therefore, is considered to constitute a more sustainable location to accommodate residential growth. Most notably, Ogmore By Sea scores '13' in respect to 'Daily Facilities' whereas Llangan only scores '3', evidencing that residents in Ogmore have much better access to services within the locality as compared to Llangan.

Given the above, 'Land at Hazelwood, Ogmore' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Hazelwood, Ogmore' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help

sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3zt
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3z4
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z6
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3z8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zv
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zc
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zw

7207 Comment

Document Element: Gileston Road junction, St
Respondent: Barratt Redrow Homes [2669]
Agent: Turley

Summary:

Policy TR1 states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG1 KS4m the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Full text:

Policy SP1 - Sustainable Growth Strategy
Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.
It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.
In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"
Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be concentrated is supported.

Policy SP2 - Settlement Hierarchy
The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable. As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Policy SP4 - Placemaking

We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.
The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses... ' or to be developed at 'high densities... and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.
Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Policy PGDl - Creating Well Designed and Inclusive Places
There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ". The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what

is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy

requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy CII - Open Space Provision
The wording of Policy CII, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy CII should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy CII requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities

Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7231 Object

Document Element: Weycock Cross roundabout,

Respondent: Gwynfor Parr [3649]

Summary:

I wanted to make you aware that in your plans to widen the road to 3 lanes on Pontypridd Road by integrating the road for the row of houses opposite the petrol station.
I wanted to make you aware that my Grandma lives on that side of the road and on her deeds she owns the frontage of the garden, part of the road and the grass verge that goes up to the main road.
I can send a copy of this information.
The plans cannot go ahead unless the land is bought off my grandmother and the other properties on the street! My grandma bought the house from a developer.
I wanted to make sure that you are aware of this situation.

Full text:

I wanted to make you aware that in your plans to widen the road to 3 lanes on Pontypridd Road by integrating the road for the row of houses opposite the petrol station.
I wanted to make you aware that my Grandma lives on that side of the road and on her deeds she owns the frontage of the garden, part of the road and the grass verge that goes up to the main road.
I can send a copy of this information.
The plans cannot go ahead unless the land is bought off my grandmother and the other properties on the street! My grandma bought the house from a developer.
I wanted to make sure that you are aware of this situation.
Also I wanted to point out the increased congestion especially now with the road works and this would only get worse.
There would be a loss of privacy to existing neighbours due to new properties overlooking existing properties and the noise of development.
There is a lack of infrastructure for example schools in the area are already full, doctors are full and have no appointments.
Can someone please get back to me especially regarding my grandmothers land at the front of the property that you are looking to alter.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/337

4985 Object

Document Element: SP11 - RETAIL, COMMERCIAL AND SERVICE CENTRE HIERARCHY
Respondent: Emma Reed [2653]

Summary:
I would suggest that Rhoose is a neighbourhood centre with most residents needing to travel to BArry or Llantwit Major for most goods.

Full text:
I would suggest that Rhoose is a neighbourhood centre with most residents needing to travel to BArry or Llantwit Major for most goods.

Change suggested by respondent:
Rhoose changed to a neighbourhood centre

Sound: No
Attachments: None

5044 Comment

Document Element: SP11 - RETAIL, COMMERCIAL AND SERVICE CENTRE HIERARCHY
Respondent: Mrs Wendy Hussey [3085]

Summary:
Look after the town. Make sure it is upgraded and not be left to slowly deteriorate.

Full text:
Look after the town. Make sure it is upgraded and not be left to slowly deteriorate.

Change suggested by respondent:
Put the needs of the local population first

Sound: No
Attachments: None

5672 Support

Document Element: SP11 - RETAIL, COMMERCIAL AND SERVICE CENTRE HIERARCHY
Respondent: Mr David Entwistle [3264]

Summary:
I support any attempt to revitalise and improve Barry town centre/Holton road. I support improvements to infrastructure and projects aimed at making the area a nicer place to spend time/shop. I think the council should do more to actively encourage new retailers, both major brands and small local businesses. Can deals on lower business rates be offered to attract new retailers? Can the old Wilkinson shop be used a location for small pop up stalls for local crafts and businesses or as a space for a weekly market and other events?

Full text:
I support any attempt to revitalise and improve Barry town centre/Holton road. I support improvements to infrastructure and projects aimed at making the area a nicer place to spend time/shop. I think the council should do more to actively encourage new retailers, both major brands and small local businesses. Can deals on lower business rates be offered to attract new retailers? Can the old Wilkinson shop be used a location for small pop up stalls for local crafts and businesses or as a space for a weekly market and other events?

Change suggested by respondent:
-

Sound: Not specified
Attachments: None

6681 Comment

Document Element: SP11 - RETAIL, COMMERCIAL AND SERVICE CENTRE HIERARCHY
Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:
South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.
We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.
Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.
Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access,

Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process. 77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where "qualifying activities" take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states 'The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.'
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.

• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery. Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)
identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.
South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence

Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at: https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)

Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."

• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.

• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

6720 Comment

Document Element: SP11 - RETAIL, COMMERCIAL AND SERVICE CENTRE HIERARCHY

Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer supply chains. This limits opportunities for strengthening local food economies. It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for 'local affordable food' outlined in SP5.

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning guidance (SPG) proposed. We are keen to ensure that these SPG's are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are involved in the development of some of these. The content and application of the SPG's will be fundamental to the effectiveness of several of the policies identified in the deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: "The Local Development Plan will support resilient and sustainable local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part of sustainable growth."

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

"Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other opportunities for local food production as part of multifunctional green infrastructure."

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is

likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

6.54 We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live full, productive and prosperous lives.'

6.60 We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to ensure Developers submit a quality HIA and implement the conclusions.

6.61 Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

6.62 Wales Health Impact Assessment Support Unit has recently released guidance on HIA - see https://phwwhocc.co.uk/whiasu/ for more information and toolkits to ensure most up to date is in use.

6.63 Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the community..'.

6.65 Suggestion to change wording from 'encouraged' to 'expected' for example: Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement for HIA will assist with this expectation.

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference “enhancements to leisure, sport and recreation spaces”. Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation. It is recommended that the Key Site schedules include minimum on-site provision standards and delivery phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population growth.

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer supply chains. This limits opportunities for strengthening local food economies.
It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for ‘local affordable food’ outlined in SP5.

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach.”

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: “Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food infrastructure within walking distance of new residential areas.” This addresses diet related health inequalities, encourages healthier communities and aligns with HIA guidance.

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming

models.

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses - to include the following wording: “Rural diversification proposals that support agro-ecological farming, sustainable local food production,
community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations.”

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel
Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022
01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing
flooding and making use more comfortable during hot weather (such as shading from trees). We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

SP13 Community infrastructure and planning obligations:

We want to take this opportunity to highlight the challenges that population growth places on healthcare
services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure. Please refer to the information provided as part of the background evidence paper titled 'BP37
Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within
existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new
developments to take forward its strategic objectives.

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space Assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres. Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.”
There is no reference to the expectation that local communities are consulted in relation to the development of community facilities. We would like to see a
requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and
challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities
that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales’ push for local supply resilience, this is a major opportunity gap. Consider including the following wording:

“Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains.” This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or
urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: “Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing.”

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food
production, short supply chains or sustainable farming practices.
Consider including the following wording: “Development proposals should encourage short supply chains, low-carbon

farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives."

Change suggested by respondent:

Consider adding: "The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach."

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

6944 Comment

Document Element: SP11 - RETAIL, COMMERCIAL AND SERVICE CENTRE HIERARCHY

Respondent: Penarth Town Council (Mr Pete Newton, Principal Policy, Innovation and Development Officer) [1125]

Summary:

With Penarth classified as a Service Centre, they are identified as having a defined role. However, the decline of in-person retailing means that defining role is not that evident, and Members felt there is potentially a need to move away from the traditional retail role of Town Centres in favour of "repurposing, creating multifunctional, commercial, and service centres that meet the needs of the communities they serve" in line with Future Wales Town Centre First Policy. The term 'repurposing' suggests a stronger role for the public sector in enabling these new purposes, and Members felt that Placemaking Plans could be one potential framework for this.

Members felt that potential functional support that could be provided could include:
• The appointment of a Town Centre Manager
• Using supporting interventions such as an extension or reshaping of normal services such as Neighbourhood Services.
• Using existing or emerging new powers, such as compulsory purchases.

Members wished for the RLDP to facilitate the safeguarding of essential public services, including health, policing, fire and rescue in the town, which would help to develop the defining role of a Service Centre, and felt that specific reference to these would be beneficial.

Full text:

Penarth Town Council Deposit RLDP Consultation Response

Comments collated at a meeting of the Council's Consultation Task and Finish Group on 9th February 2026

Some Members attended the RLDP consultation drop-in session in Penarth and in general found it to be very informative.

Members support the general development strategy but did note the lack of information concerning discussions with adjacent and other nearby Principal Councils in the CJC Region. In view of the forthcoming Strategic Development Plan, encompassing the ten authorities, members felt that some further commentary regarding this is warranted.1

It is clear that the approach taken in the Cardiff paper is still that ideally, each Council is self-contained and "consumes its own smoke," which does not show any wider strategic thinking between the ten authorities in preparation for a regional Strategic Development Plan.

Members agreed with the view that infrastructure to support new housing developments was required in order to create successful developments, although they acknowledged that logistically it was difficult to pre-empt demand for some services such as travel and health services. Members also noted that predicting developmental needs and opportunities within wider context surrounding the UK's economic, political, and social landscapes.

Members noted that there was not much focus on Penarth or identified potential future development for Penarth beyond that already underway at the location near to Cosmeston but welcomed flexibility in its approach. Members expected to be more closely involved in the decisions and planning of this, and other such developments, and provide opportunity for wider consultation where appropriate, such as pre-application consultations, as well as would expect to be included in consultations concerning sites adjacent to Llandough, Dinas Powys, and Sully given their impact upon the town.

Penarth as a town is currently developed to its boundaries, save for the development at Cosmeston. It is, therefore, more dependent than other Service Centres on windfalls of land or buildings which may arise during the currency of the Plan. In 2023, an extensive assessment of the potential of the town concluded the following:

"There is marginally less capacity in Penarth [and Llandough] than the projected figures. However, this does not mean that the projections are incorrect or unjustifiable. The reported figures have not included a significant amount of capacity on open space land, and the projected figures for conversion of existing buildings and intensifications will be surpassed if the extant consents that exist this early in the Plan period are implemented."

The degree of flexibility, however, is substantially depending on one large site. P009, Headland School, is identified as both a potentially disused building and as a site with a capacity of 111-120 units. This special school is full to capacity and used by many Council in both Wales and England.

Members did note the inclusion of Cogan Transport Interchange under section 6.196 but would have liked to see more information about its future developments as they see it as key to increasing public transport use to Barry and further to West Wales in general.

Members wished to advise that issues with both the bridge and the platforms at Cogan have been long term, with accessibility being central to these issues. Members felt that improvements to accessibility should be a priority at this site, with planting and landscaping considered secondary to this.

Members felt it was key to consider the additional stress on Penarth from increased anticipated demand of public transport needs and emphasised the need for this to be aptly considered by bus route providers as part of development work.

Members wanted to see a strategy that actively protects the town's heritage and culture whilst still being able to provide for current and future generations.

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16 and section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report2, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Under CC2, it was noted that the presumption against demolition3 in favour of retrofit and reuse may constrain maximum transition to net zero as, whilst there is grant aid available for public buildings and social housing, the retrofit monies available for private stock is limited.

Additional considerations will also need to be made as part of the Third Carbon Budget (2026-2030), Local Area Energy Plans and the climate change ISA theme.

Members also felt similar about the inclusion and consideration of sustainable development through the specific strategy outlined in section 5 of the document and felt this linked in well with ongoing Placemaking work and its strategic approach as detailed in SP4.

Members were pleased to see mention of the diversification of high streets, although noted that Penarth was above average in terms of occupancy. They hoped that the RLDP would be able to support the town centre and support other ways it could be improved, such as a fishmonger or identifying a site for a new Cemetery.

With Penarth classified as a Service Centre, they are identified as having a defined role. However, the decline of in-person retailing means that defining role is not that evident, and Members felt there is potentially a need to move away from the traditional retail role of Town Centres in favour of "repurposing, creating multifunctional, commercial, and service centres that meet the needs of the communities they serve" in line with Future Wales Town Centre First Policy. The term 'repurposing' suggests a stronger role for the public sector in enabling these new purposes, and Members felt that Placemaking Plans could be one potential framework for this.

Members felt that potential functional support that could be provided could include:
• The appointment of a Town Centre Manager
• Using supporting interventions such as an extension or reshaping of normal services such as Neighbourhood Services.
• Using existing or emerging new powers, such as compulsory purchases.

Members wished for the RLDP to facilitate the safeguarding of essential public services, including health, policing, fire and rescue in the town, which would help to develop the defining role of a Service Centre, and felt that specific reference to these would be beneficial.

Members supported the avoidance of coalescence with adjacent settlements through the reconfirmation of Green Wedges as it allows for relevant extensions to those settlements whilst allowing them to retain their identity.

Members noted that the Quiet Area provision under DNP6 only applies to Penarth and wished to know why this was the case.

Members advised that they welcomed further opportunity for consultation, particularly in relation to developments in the neighbouring Cardiff Bay area whilst acknowledging that this is not necessarily an RLDP concern.

Footnotes

1 There is an evidence paper concerning relations with Cardiff and a Statement of Common Ground with Bridgend. However, there is only a reference in the RLDP text to discussions with other regional Councils and not the paper itself. We would be grateful if you could provide the paper as it does impact on the soundness of this Plan.

2The UK Climate Change Committee's 'Progress Report: Reducing Emissions in Wales' highlighted the following aspects of import: Skills, Vehicle Charging Networks, Improving Recycling, Energy Plans, Decarbonising Public Buildings and Social Housing, and reducing Road transport Demand (Car-Kilometres).

3The UK Environmental Audit Committee (2022) noted that "the evidence we received consistently recommended that retrofit and reuse be prioritised over new build."

Change suggested by respondent:

Members wished for the RLDP to facilitate the safeguarding of essential public services, including health, policing, fire and rescue in the town, which would help to develop the defining role of a Service Centre, and felt that specific reference to these would be beneficial.

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3d5

7017 Object

Document Element: SP11 - RETAIL, COMMERCIAL AND SERVICE CENTRE HIERARCHY

Respondent: Lidl GB Limited [1459]

Agent: CarneySweeney

Summary:

Lidl Great Britain Ltd objects to draft policy SP11 (Retail, commercial and service centre hierarchy) as worded as it fails to meet Test 2 (Is the plan appropriate?). Draft Policy SP11 sets out the proposed retail hierarchy (See extract below), but it does not accord with the settlement hierarchy as set out in draft Policy SP2 and it is not justified.
The adopted LDP Settlement Hierarchy lists:
Key Settlement: Barry
Service Centre Settlements: Cowbridge, Llantwit Major and Penarth
The adopted LDP Retail hierarchy lists:
Town centres: Barry
District centres: Barry (high street/broad street), Cowbridge, Llantwit Major, Penarth
Draft SP2 of the Deposit Plan identifies Cowbridge, Llantwit Major and Penarth as Service Centre Settlements in the Settlement Hierarchy.
However, draft SP11 lists a retail hierarchy as follows:
Town Centres – Barry (Holton Rd), Penarth, Cowbridge
District Centres – Barry (High Street), Llantwit Major
It is unexplained and unjustified that the SP11 retail hierarchy upgrades Cowbridge to Town Centre status, while Llantwit Major and Barry High Street remain District Centres.
The Deposit Plan includes two retail allocations, neither are intended to directly serve Penarth or Cowbridge. Cowbridge is not a focus for growth. It is therefore unjustified that Llantwit Major, which is served by a train station, is a settlement roughly twice the size of Cowbridge (by population) and is a manifestly more sustainable location and more appropriate focus for growth, is proposed to rank below Cowbridge in the retail hierarchy. Barry, Penarth and Llantwit Major should rank as Town Centres as the most sustainable locations for growth.
Penarth is an accessible settlement and an appropriate focus for growth. Indeed, the Council's BP13 (Retail and Commercial Leisure Study (June 2023)) recommends a medium to large supermarket to serve Penarth (Zone 5) but the Deposit Plan is absent of any food retail allocation for Penarth/Llandough. In addition to Llantwit Major and St Athan (Deposit Policy SP12) Penarth should be a focus for additional convenience provision over the plan period.

Full text:

Draft RCS2 sets out three criteria for new A1, A2 or A3 uses on new sites or existing retail areas which are as follows:
1. "It can be demonstrated that there is an additional need for the proposal which cannot be provided within an existing retail, commercial and service centre; and
2. The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.
3. The proposal would serve local needs in a neighbourhood or rural village."
We consider the policy should read as follows:
"1 It can be demonstrated that there is an additional need for the proposal which, when applying the sequential approach to locating development as outlined in national guidance, it has been demonstrated that the site is sequentially preferable; and
2 The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.
3 Proposals serving only local needs should be of a scale and type which does not undermine the vibrancy, attractiveness and viability of neighbourhood centres."

The settlement boundary, defined by Policy SP2, excludes allocation site SP12 'Land at Bridge House Farm, Llanmaes, Llantwit Major' which is for a retail foodstore. Instead, the draft allocation abuts, but lies outside, the settlement boundary as currently drawn. Although draft Policy SP3 states that "Areas outside settlement boundaries that are not allocated or protected for a specific use will be defined as countryside we consider the settlement boundary must be extended at this location to include the allocation. Its exclusion is illogical and would fail to reflect the 'on the ground' position when this allocation is delivered. Moreover, its exclusion could confuse and may constrain any future minor development changes at the site (e.g. those needed to meet operational needs the subject of any planning application). The draft proposals map shows the allocation as a dot which does not cover the full extent of the allocation. See below: See plan in attachment
By not including the extent of the site/allocation within the defined settlement boundary, the draft plan fails to recognise the allocation will form an important part of the settlement, the delivery of which is crucial to meeting identified needs. Accordingly, we believe this fails Test 2 (Is the plan appropriate?), and it may fail Test 3 (Will the plan deliver) as its exclusion from the boundary may unduly impact the future site operation.

Lidl Great Britain Ltd objects to draft policy SP11 (Retail, commercial and service centre hierarchy) as worded as it fails to meet Test 2 (Is the plan appropriate?). Draft Policy SP11 sets out the proposed retail hierarchy (See extract below), but it does not accord with the settlement hierarchy as set out in draft Policy SP2 and it is not justified.
The adopted LDP Settlement Hierarchy lists:
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However, draft SP11 lists a retail hierarchy as follows:
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The Deposit Plan includes two retail allocations, neither are intended to directly serve Penarth or Cowbridge. Cowbridge is not a focus for growth. It is therefore unjustified that Llantwit Major, which is served by a train station, is a settlement roughly twice the size of Cowbridge (by population) and is a manifestly more sustainable location and more appropriate focus for growth, is proposed to rank below Cowbridge in the retail hierarchy. Barry, Penarth and Llantwit Major should rank as Town Centres as the most sustainable locations for growth.
Penarth is an accessible settlement and an appropriate focus for growth. Indeed, the Council's BP13 (Retail and Commercial Leisure Study (June 2023)) recommends a medium to large supermarket to serve Penarth (Zone 5) but the Deposit Plan is absent of any food retail allocation for Penarth/Llandough. In addition to Llantwit Major and St Athan (Deposit Policy SP12) Penarth should be a focus for additional convenience provision over the plan period.

SP12 – RETAIL FLOORSPACE PROVISION
Lidl Great Britain Ltd firmly supports the allocation within draft Policy SP12 (Retail Floorspace Provision) for 1,251sqm of convenience floorspace at Land at Bridge House Farm, Llanmaes, Llantwit Major. This allocation is needed to ensure the plan is sound, by addressing unmet need at Llantwit Major which is a Service Centre and focus for growth. This should be made clear in the reasoned justification.
In respect to Penarth, Policy SP12, together with supporting paragraphs 6.208–6.210, do not, however, adequately reflect the findings of the Council's Retail & Leisure Study (BP13). Policy SP12 should also plan positively for the identified convenience retail needs within Zone 5 (Penarth/ Llandough). BP13 confirms that Penarth District Centre is not served by a medium to larger supermarket (para. 9.2). The BP13 Study finds quantitative and qualitative capacity for a medium to larger supermarket by 2036 in Penarth (paras. 9.23, 12.24).
It finds overall quantitative convenience capacity of up to c.5,862sqm net floorspace (assuming deep discounter operators). In qualitative terms the following Centres have been identified in potential need for a medium to larger supermarket: Barry Holton Road town centre; Penarth district centre and Llantwit Major district centre. Quantitative and qualitative need is identified.
Despite the evidence of unmet need, the Deposit LDP Policy SP12 allocates only two sites for convenience retail totalling c. 3,109sqm net; one site at Llanwit Major and a second site at St Athan. This is below the overall (up to 4,282–5,862sqm net) requirement identified in BP13. The allocation of land at Llantwit Major aligns with the evidence base, has been thoroughly tested at application stage and this is fully supported.
Policy SP12 is silent on the need for additional floorspace at Penarth/Llandough (Zone 5) and as such does not reflect the evidence base findings and address identified need in Penarth, with a 'residual' quantitative capacity of c.1,173–2,753sqm net unmet/unallocated. We note Policy SP12 states that any additional convenience and comparison retail floorspace beyond that provided by the identified sites should be directed towards the town and district centres outlined in Policy SP11. However, this merely reflects national guidance in respect to directing growth to town/district centres (i.e. applying a sequential approach). The Policy should go further and seek to allocate the residual unmet need to Penarth/ Llandough. We note the BP13 is silent on additional need at St Athan.
Planning Policy Wales (PPW) 12 requires LPAs to identify the appropriate form, scale and location to meet retail needs (para. 4.3.8) and emphasises ensuring communities have access to adequate retail provision (para. 4.3.13). PPW

therefore places a duty on LPAs to plan positively for evidenced retail needs. In respect to Penarth/Llandough Policy SP12 should seek to address this requirement.
Under PPW and TAN4, LPAs must apply the sequential test, directing new retail development to locations that are:
• In-centre,
• Edge-of-centre, and only then,
• Out-of-centre locations that are accessible and well-connected to the catchment.
Penarth Centre is physically constrained. In the absence of any in-centre or edge-of-centre sites capable of accommodating a medium/larger supermarket, the next sequentially preferable option is the most accessible, well-connected site within the same catchment, capable of meeting identified need and reducing expenditure leakage.
Policy SP12 should plan positively for needs in Zone 5 (Penarth/Llandough) and include provision for a medium to large convenience foodstore in Zone 5 in accordance with BP13.
Enclosed with this representation is a separate representation (Under 8. New site submission) promoting a site for food retail development to meet identified needs within the Zone 5 Penarth/Llandough catchment. The site is considered accessible and sequentially preferable to meeting identified needs in Penarth.
The policy should be clear that identified need should be delivered in accordance with the sequential approach as set out in national guidance. As set out in Policy SP12 any additional convenience and comparison retail floorspace beyond that provided by identified sites should be directed towards the town and district centres in accordance with the sequential approach. We support that the inclusion of retail floorspace as part of a mix of uses on allocated sites will also be supported.

POLICY DNP2 – GREEN WEDGES
Lidl objects to the inclusion of land at Penlan Road, Llandough (see Site Location Plan, drawing no. 3744 F420) within the Green Wedge designation under Policy DNP2. The site forms a distinct and enclosed parcel of land on the north-eastern edge of the designated Green Wedge, and its physical characteristics demonstrate that it does not serve the strategic purposes of the wider designation.
The northern and western boundaries are formed by Llandough Hospital, including the hospital access road and surface car parking, which clearly separate the site from the wider Green Wedge. The southern boundary is defined by residential properties along Corbett Road and the Merrier Harrier public house. The south-western and western boundaries are formed by further residential properties within Llandough. As such, built development extends beyond the site in multiple directions, meaning it does not contribute to the open land between settlements that Green Wedges are intended to protect.
The site is physically and visually contained with strong, defensible boundaries. Its close association with existing built form means that it does not exhibit the level of openness required for Green Wedge designation under PPW or BP27. BP27 requires Green Wedge boundaries to include only land that must remain open in the long term. When assessed against the four-stage SE Wales Green Wedge methodology, the site performs weakly. In terms of openness (Stage A), the site has low perceived openness as it is enclosed by development. Under development pressure (Stage B), the influence of surrounding built form means the site is already urban in character. In relation to Green Wedge purposes (Stage C), the site does not materially contribute to preventing coalescence, safeguarding open countryside, or protecting the setting of an urban area. The conclusion (Stage D) is therefore that the site's inclusion within the Green Wedge is anomalous.
Recent decisions in the emerging RLDP, such as the allocation of HG1 KS2, demonstrate that selective Green Wedge boundary amendments are acceptable where supported by evidence. Not all areas within the current designation are equally sensitive, and the site represents one of the least sensitive parts.
The Council's own evidence further supports the suitability of the land for development. The site does not lie within the Special Landscape Area that covers much of the remaining Green Wedge, highlighting its lower landscape sensitivity. The Candidate Site Assessment (BP18a examined the wider parcel (Site ID 400) for housing and concluded that it would form a natural extension to the Llandough settlement boundary. It noted that the land would represent an incursion only if less sensitive sites could not be delivered and discounted the site solely because housing need had been met elsewhere, not due to landscape or Green Wedge harm. This confirms the Council recognises the land is capable of development. The same land can therefore appropriately meet other evidenced needs, including retail provision.
In separate representations, Lidl is promoting land to the south of Llandough Hospital via 'RDLP New site submissions'. It is considered that the site can be developed in a low-impact, landscape-led and sensitively designed manner that respects its transitional position between the urban edge and the wider Green Wedge. A modest single storey medium sized foodstore delivers a built form that can sit comfortably below surrounding tree lines and hospital structures. A comprehensive landscape strategy, including reinforced boundary planting, native woodland edge enhancement, and carefully designed building can soften building edges, strengthen the site's defensible boundaries, and integrate the scheme with its surroundings. The development would therefore appear as an infill of the existing urban area, rather than any intrusion into the open countryside, and can be designed to maintain the wider Green Wedge's openness and character by delivering a strong defensible physical boundary which prevents any further development beyond the site.
As set out in separate representations the Council's Retail and Leisure Study (BP13) identifies a clear quantitative and qualitative need for a medium to larger supermarket within Zone 5, alongside notable levels of convenience expenditure leakage to Zone 3 (Cardiff). The promoted site is well positioned to intercept this leakage, meet the identified convenience floorspace requirement, and provide improved local convenience retail provision for Llandough/Penarth. There is, therefore, a clear needs-based justification for release of this parcel of land from the Green Wedge designation.
The Green Wedge boundary should be amended at this location to remove the promoted site from Policy DNP2

(Green Wedge designation) and from the Proposals Map. In parallel, the settlement boundary defined by Policy SP2 should be realigned to include the promoted site, reflecting the site's physical relationship with existing development, its defensible boundaries, and its suitability to meet an evidenced strategic retail need.

The Policy text should be changed as follows:
"Proposals involving the change of use at ground floor level uses from A1 retail use within Service Centres will permitted where the proposal would:…"
The Policy RCS1 (Resilient retail, commercial and service centres) supporting text adds new policy requirements which are not within the draft policy. Paragraph 6.214 states that:
"Changes of use class in Retail, Commercial and Service Centres must be justified by evidence that the property has been affected by a sustained period of long-term vacancy and that proactive marketing has been undertaken by a property agent for a minimum of 12 months in an effort to secure tenants. The marketing report should include:
• Details of the existing use or previous use if vacant;
• The length of time the unit has been vacant, if applicable;
• The type of use which the unit has been marketed for, what the marketing strategy involved and its duration;
• The amount of interest in the unit during the marketing period – this should detail the number of queries, the type of uses sought, and if known, the reason for not pursuing any initial enquiries."
However, nowhere in the draft policy wording does it explicitly state to include 12 months of marketing activity. The draft supporting text reads as though this is a policy requirement, rather than supportive guidance. This is contrary to caselaw which confirms that supporting text cannot be used to expand the policy beyond its wording (R (Cherkley Campaign Ltd) v Mole Valley District Council). A proposal could meet the requirements of the criteria sets out in draft policy RCS1 without being marketed for a minimum of 12 months. If the Plan is adopted as currently set out, there is a risk of internal inconsistency between policy RSC1 and the supporting text. Accordingly, this would fail Test 2 (Is the plan appropriate?) as it is not coherent or consistent.
We also have concerns with criterion 5 which states to "Avoid an over-concentration of non-retail uses that would undermine the retail function of the centre". This is because 'over-concentration' has not been defined within the draft policy. This contrasts with draft policy RCS3 which includes a definition of what an over-concentration of hot food takeaways would be. Without a definition of what an over-concentration of non-retail uses is, the draft policy will remain and lack clarity. Additionally, without a definition, the draft policy may fail Tests 2 and 3 as it is currently unclear (Test 2: Is the plan appropriate?) and cannot be effective (Test 3: Will the plan deliver?).

At present, we consider the Deposit Plan inadequately supports the Welsh language. Although the Welsh Language is included within Objective 6 (Embracing Culture and Heritage), the Deposit Plan does not contain a policy which seeks to promote the Welsh language, nor is the promotion of the Welsh language referenced in other Deposit Plan policies where this may be appropriate. Without a clear policy, applicants do not need to explicitly consider impact on the Welsh language so the role of the RLDP will be limited.
Local Development Plans should accord with national policy and guidance. For instance, the supporting text to Policy 1 of Future Wales states that "Key issues, including … the Welsh language, are core elements of policy 1 and are common threads underpinning all Future Wales policies." However, we believe that the Welsh language is not currently underpinning the policies within the Deposit Plan.
Additionally, paragraph 3.25 of PPW states that "The Welsh language is part of the social and cultural fabric and its future well being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. The land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its, use and the Thriving Welsh Language well being goal." Paragraph 3.29 goes on to suggest language impact assessments are required for "large developments not allocated in a development plan which are proposed in areas of particular sensitivity or importance for the language" with these areas defined in the LDP. In this instance, PPW sets out guidance for developers which is not present in the Deposit Plan.
The Vale of Glamorgan Council commissioned AECOM to produce the Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan (November 2025). Paragraph 9.5.9 recommends including a specific policy that supports and protects the Welsh language within the Deposit Plan. This contrasts with the Welsh Language (November 2025) Background paper, produced by the VoGC, which concludes that a specific Welsh Language policy is not warranted, albeit it does acknowledge the Plan's statutory duty to consider the Welsh language and embed relevant provisions within broader thematic policies. However, this is currently lacking as the Deposit Plan does not reference the Welsh language within other policies. Although the Background Paper considers that the RLDP is "unlikely to adversely affect the existing patterns of Welsh language use within the Vale of Glamorgan", the Plan should seek to promote the Welsh language.
Developers should be encouraged to promote the Welsh language where this may be reasonable and appropriate e.g. bilingual signage and announcements. Lidl actively promotes the Welsh language through their business. The Deposit Plan should be amended to strengthen the importance of the Welsh language, helping to meet Objective 6 over the RLDP period. Overall, without clear Welsh Language policy promotion, the Deposit Plan cannot positively impact the Welsh language. The Deposit Plan needs to go further.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rm

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rn
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4ry
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rp
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rq
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4sr

4707 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Shirley Williams [1695]

Summary:

I believe VOG is a vital Welsh region with diverse cultural, historical, and geographical significance, and the RLDP should preserve and improve these areas. I oppose the proposed Lidl supermarket in Llanmaes, as it contradicts the RLDP by risking urban sprawl and damaging the village's conservation status. Llanmaes is a historic, community-oriented village with active social, recreational, and environmental commitments.

A large supermarket would harm its character, natural resources, and local social hubs, and I consider it detrimental to both Llanmaes and Llantwit Major taking people away from the existing retail and conflicts with the RLDP.

Full text:

VOG is unique within Wales with a relatively large and important areas: in cultural, historical, geographical, industrial, commercial, agricultural and recreational terms. It's span from seaside villages/towns, previously, highly important previous industrial areas, such as the docks in Barry, the fertile farming areas, the market town of Cowbridge, the recreational areas of Barry, the Heritage Coastal Path, the ancient seat of learning in Llantwit Major to the historic villages and hamlets of the Vale.
In my opinion, the RLDP should maintain and wherever possible improve on these traditional areas. As an example, Barry has benefited from major improvements in recent years and the VOG should be commended for the regeneration of this area.

I live in the village of Llanmaes where there is a proposed building of a major Lidl Supermarket store. It seems to me that this is in direct contradiction to the VOG RLDP for the following reasons:

* This will undoubtedly, lead to Urban sprawl.
*Llanmaes is an Ancient Conservation village. The Church dates from 1234 and there are many Listed Dwellings.
*Community Council and Social Committee. Both maintain the external Environment of Llanmaes, including the Community Hall. Numerous Social events take place, including Charity Events, (Velindre etc.), a monthly film, a Summer Fête, Fashion Show, Harvest Festival on so on.
The list is endless and the Social Committee has recently, received an award. People from the area are encouraged to attend and there are strong links with the local pub, the Blacksmith's. This cooperation has helped the pub to remain open in the village, when many pubs have closed. There is a true and meaningful Community connection in Llanmaes.

*The village is a Recreational area for cyclists, walkers, the disabled, horse riding and so on. As a member of the VOG Ramblers, we often walk through Llanmaes. I often see the disabled being walked through the village by carers, cycling clubs cycle through the village on Sunday mornings and riding schools bring young children through the village, as well as more mature riders without even mentioning dog walkers.

With an ageing population, the village is an important area for gentle exercise. There is a route which we call the 'Sigginstone' route which goes through the village to Sigginstone, Llantwit Major and back into Llanmaes.

*Mental Health and the Cost of Living issues are genuinely helped by these elements.

*Natural Resources Wales' recent report on River pollution, Air Pollution and Flooding is very poignant to Llanmaes. Only this week, Dŵr has been in evidence in the village this week because of potential flooding. This is a constant concern for the area.

*This is an Agricultural area with Farming areas, being at the heart of the Community. Conversation is also at the heart of the village as a Conservation area. We have Green Areas.

In my opinion, Lidl, a massive Commercial Supermarket is not an improvement to the area. In my opinion, it will be detrimental, both to Llantwit Major and Llanmaes, as well as the wider area. Filco and the Cooperative Society in Llanmaes have also become a Social hub which encourages people to go into the centre of Llantwit Major which has had a knock on effect to encourage people into cafes and other shops in the centre of Llantwit Major.

Therefore, in my opinion, the proposed Lidl Supermarket does not enhance the area, nor does it fit into the RLDP.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/sgb

4818 Object

Document Element: Land at Bridge House Farm,

Respondent: Councillor Gwyn John [204]

Summary:

I wish to object to the proposed retail site in Llanmaes, which is currently under review by the WG and PEDW. I support the Planning Officer's refusal of a supermarket on this site. Including this area in the RLDP appears to be a change from the Planning Department's view in making their decision, as Llanmaes will join a new rural ward in May 2027, separate from Llantwit Major. I suggest considering the site on Eglwys Brewis Road, formerly the Naafi Shop, which belongs to WG and I believe would be suitable due to the lack of nearby amenities for residents.

Full text:

I refer to the current consultation on the RLDP and wish to raise my objection to your plans for a Retail Site in Llanmaes Village which is currently in the hands of the WG who are dealing with a Call-In which has been referred to PEDW.
I strongly object to the idea and support the report of the Planning Officer which REFUSED the building of a Supermarket on this site. In my opinion, suggesting that this area be included as a Retail site in the RLDP is changing the Planning Department's view in making their decision. Llanmaes will, in May 2027, become part of a new rural ward made up with other Villages. It will be no part of Llantwit Major, I understood previously that you had highlighted a site within the Town boundary of Llantwit Major, but that idea appears to have been withdrawn.
May I suggest that of you are looking for a site, you investigate the site on the Eglwys Brewis Road where the old Naafi Shop stood for many years which belongs to WG. In my opinion this would be a perfect site as many houses have been build in that area with no shop in close proximity of these homes, and residents have to travel into St Athan Village or Llantwit Major.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/sw4

4865 Object

Document Element: Land at Bridge House Farm,

Respondent: PER Consulting (Mr Keith Thomas, Director) [987]

Summary:

I believe allocating retail space out of town in open countryside conflicts with sustainability goals and protecting open spaces and accessible town centres. Including a retail policy within a designated "green wedge" is contradictory, as both should be protected from urban expansion and retail development. The Retail Study indicates sufficient local convenience retail capacity, but any growth should undergo detailed assessment and prioritise town centre locations, which are more sustainable. Additionally, the allocation policy is premature given ongoing investigations into the Council's planning enforcement issues.

Full text:

Allocation for out of town retail in open countryside is at total odds with the wider sustainability objectives and need to protect open countryside and sustainable access to town centres.
Including a retail allocation policy within the other policy of nominated "green wedge" is contradictory - if this should be protected from urban expansion it needs to be protected from delivery of town centre retail uses as well
The Retail Study already shows a high level of retained capacity of convenience retail spend in the local area and whilst there may be theoretical capacity for growth this needs much more detailed consideration as to location and sequential site test to concentrate such uses in and to support the core town centre which is by definition a far more sustainable/walkable and public transport focused destination.
The allocation policy is also premature whilst PEDW properly investigate the Council's poor control of planning policy by approving a non-compliant application against officers advice.

Change suggested by respondent:

Delete proposals to a retail allocation in the open countryside. Reinforce the town centre first principle policy for sustainable development

Sound: No

Attachments: None

4879 Object

Document Element: Land at Church Farm, St

Respondent: Mr Tim Brown [3000]

Summary:

I object to another shop or supermarket. The village is adequately served by three food shops. Another food shop will be harmfull to well established businesses. Lidl are coming to Llanmaes and this will be detrimental to St Athan village food businesses. Yet another food shop at the Church farm development will compound the problem.

Please scrap plans for another shop and allow existing food businesses that are struggling to enjoy a much needed boost from a housing expansion. We already have a good Post Office, we certainly dont need another one.

Full text:

I object to another shop or supermarket. The village is adequately served by three food shops. Another food shop will be harmfull to well established businesses. Lidl are coming to Llanmaes and this will be detrimental to St Athan village food businesses. Yet another food shop at the Church farm development will compound the problem.

Please scrap plans for another shop and allow existing food businesses that are struggling to enjoy a much needed boost from a housing expansion. We already have a good Post Office, we certainly dont need another one.

Change suggested by respondent:

-

Sound: No

Attachments: None

4888 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Linda Green [1072]

Summary:

I strongly object to the development of this field which is a natural border between the rural settlement of Llanmaes and the town of Llantwit Major. Development in this open countryside area and next to the llanmaes conservation area is against Welsh planning policy, and coalescence of town and village should be avoided.

Full text:

I strongly object to the development of this field which is a natural border between the rural settlement of Llanmaes and the town of Llantwit Major. Development in this open countryside area and next to the llanmaes conservation area is against Welsh planning policy, and coalescence of town and village should be avoided.
I support the proposal of a green wedge

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

4890 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Linda Green [1072]

Summary:

The proposed development of this site as retail is currently being considered by Welsh Government under the Call In process - therefore presumably the outcome of that process will inform this decision.
In the hope that Welsh planning policy is correctly applied and this site is rejected for retail development, I would support it's inclusion in the green wedge application as it would make no sense at all to have any development embedded within the green wedge.
Therefore I object to any retail development here but support a green wedge

Full text:

The proposed development of this site as retail is currently being considered by Welsh Government under the Call In process - therefore presumably the outcome of that process will inform this decision.
In the hope that Welsh planning policy is correctly applied and this site is rejected for retail development, I would support it's inclusion in the green wedge application as it would make no sense at all to have any development embedded within the green wedge.
Therefore I object to any retail development here but support a green wedge

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5097 Object

Document Element: Land at Church Farm, St

Respondent: Mr Tim Brown [3000]

Summary:

I oppose plans for another food shop in the village, as it would harm established businesses like Londis, Co-op, and Lifestyle, especially with Lidl opening nearby. Small retailers struggle due to rising taxes and insurance and they need support. I suggest instead a large DIY store, such as B&Q, to serve the expanding community and surrounding areas, which would be more beneficial. Additionally, a garage for automotive repairs and MOT services would better meet local needs, especially with over 1,000 new residents expected.

Full text:

I write object to another food shop or supermarket as part of this new development. The village is adequately served by three food shops. Londis, Co-op and Lifestyle which includes the Post Office. Another food shop will be most harmful to well established businesses. Lidl are coming to Llanmaes and this will be detrimental enough to St Athan village food retailers. Yet another food shop at the Church Farm development will be unwelcome competition which would probably lead to the existing food shops becoming unsustainable with a loss of livelihoods and job losses. Following the last budget, small to medium retail enterprise locally and across the UK is struggling to survive due to the national insurance rate increases and rises in business taxes, especially hospitality. These small businesses need room to breathe, give them some air and the headroom to keep trading. Londis has been there for some 70 years.

Please scrap plans for another food shop and allow existing struggling businesses to enjoy a much needed trading boost from a housing expansion. Please consider a change of intended use, a good sized DIY store would be far more beneficial as currently nothing exists in the mid vale, the nearest being B&Q in Cardiff Culverhouse or Bridgend. This would draw customers from St Athan, Boverton, Llantwit, Cowbridge, Rhoose, Barry and more rural areas. As a resident of 67 years, I assure you this would be most welcome, especially for the 1000 plus new residents of the two new housing developments keen on improving their new homes. Perhaps B&Q would be interested in a satellite store between their two main retail units. I trust you will agree, this makes perfect sense !

A point to consider. The old RAF married quarters along Eglwys Brewis road, the old RAF east camp officers quarters, the married quarters we know as Lego Land and the new Parc Ferm Wen development, I would guess, all together total around 1000 houses and there is no shop and I've never heard any demand for one ! There was a Spar on the corner near the new roundabout on Cowbridge Rd but that was demolished years ago.

Another sensible option to consider is a garage for automotive repairs and MOT station. The last village garage was demolished and cleared to make way for the Co-op. If villagers need anything doing to ourcars we have to travel to Llantwit or Barry. With potentially another 1000 plus car owners moving into the two new developments, this would be another welcome facility in the village and is worthy of serious consideration as it would be far more beneficial than an unnecessary food shop.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Paper Representation - Redacted - https://valeofglamorgan.oc2.uk/a/sn5

5155 Object

Document Element: Land at Bridge House Farm,

Respondent: Mr Roger Drye [1614]

Summary:

Development of this site will result in the physical and visual coalescence of the the town of Llantwit Major and Llanmaes. The site is outside of the RLDP's defined Strategic Growth Area and contravenes the Planning Policy of the Vale. The proposed large store is incongruous within the setting of the Green Wedge and would be a major and significant intrusion to the countryside. It is clearly detrimental to the Llanmaes Conservation Area.

Full text:

Development of this site will result in the physical and visual coalescence of the the town of Llantwit Major and Llanmaes. The site is outside of the RLDP's defined Strategic Growth Area and contravenes the Planning Policy of the Vale. The proposed large store is incongruous within the setting of the Green Wedge and would be a major and significant intrusion to the countryside. It is clearly detrimental to the Llanmaes Conservation Area.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5159 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Shirley Williams [1695]

Summary:

Proposal number SP12(2) Objection: This will result in the visual and physical coalescence of the town of Llantwit Major and the village of Llanmaes, which is incongruous within the setting of the proposed green wedge, would be a major intrusion into the countryside and clearly detrimental to the Llanmaes conservation area. Proposal (DNP2(6) the green wedge, protects against intrusions into the countryside, protects the visual and physical coalescence of a town and village and protects the setting of the Llanmaes conservation area). Also, specific proposals are needed in the RLDP for a flood alleviation scheme for the village of Llanmaes.

Full text:

Proposal number SP12(2) Objection: This will result in the visual and physical coalescence of the town of Llantwit Major and the village of Llanmaes, which is incongruous within the setting of the proposed green wedge, would be a major intrusion into the countryside and clearly detrimental to the Llanmaes conservation area. Proposal (DNP2(6) the green wedge, protects against intrusions into the countryside, protects the visual and physical coalescence of a town and village and protects the setting of the Llanmaes conservation area). Also, specific proposals are needed in the RLDP for a flood alleviation scheme for the village of Llanmaes.

Change suggested by respondent:

The Green Wedge proposal should be adopted and should include the land that Lidl intends to build a store upon - Site ID 379 Proposal Number SP12 (2). The construction of a large retail outlet at that site is clearly incongruous with the other elements of the RLDP. Mr Byron Williams

Sound: No

Attachments: None

5239 Object

Document Element: Land at Bridge House Farm,

Respondent: Mr and Mrs John & Patricia Harries [3186]

Petition: 2 petitioners

Summary:

Both of these sites lie within the conservation area of Llanmaes and should as such be protected from future development.

Site ID436 is currently an agricultural and recreational use area. Loss of this would be detrimental to the region and encroachment into this would effectively merge the village of Llanmaes into the town of Llantwit Major which would not be beneficial to the conservation area.

Site ID 379 is also within the conservation area and requires similar protection.

Full text:

Both of these sites lie within the conservation area of Llanmaes and should as such be protected from future development.

Site ID436 is currently an agricultural and recreational use area. Loss of this would be detrimental to the region and encroachment into this would effectively merge the village of Llanmaes into the town of Llantwit Major which would not be beneficial to the conservation area.

Site ID 379 is also within the conservation area and requires similar protection.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/sqp

5257 Support

Document Element: Land at Bridge House Farm,

Respondent: Llantwit Major Town Council (Clerk) [230]

Summary:

We note the land between Llantwit Major and Llanmaes should serve as a green wedge and the provision of retail floorspace, both of which are appropriate.

Full text:

Llantwit Major Town Council considers that the five areas identified for the development of Llantwit Major and its immediate localities are appropriate for the future development of the town. The allocation of an area between the Northern Access road and the Eglwys Brewis Road as a major land bank enables future housing developments but we question whether the infrastructure will be appropriate. The land at the former Eagleswell School site should be reserved for health and social care facilities. We note the land between Llantwit Major and Llanmaes should serve as a green wedge and the provision of retail floorspace, both of which are appropriate. We also note that Site ID 424 sits partially within the Llantwit Major boundary and is appropriate for employment

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5321 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Carol Watts [3231]

Summary:

This retail structure is going to cause the village of Llanmaes to be ruined with traffic, views from houses and an extremely dangerous place for it to be built. The number of accidents that have already taken place at the traffic lights will definitely increase due to people seeing a sign for a retail outlet and not concentrating on the lights. It will also be very dangerous for pedestrians for the same reasons.

Full text:

This retail structure is going to cause the village of Llanmaes to be ruined with traffic, views from houses and an extremely dangerous place for it to be built. The number of accidents that have already taken place at the traffic lights will definitely increase due to people seeing a sign for a retail outlet and not concentrating on the lights. It will also be very dangerous for pedestrians for the same reasons.

Change suggested by respondent:

Build it somewhere less dangerous

Sound: No

Attachments: None

5339 Object

Document Element: Land at Bridge House Farm,

Respondent: Mr Darren Green [3236]

Summary:

This would sit in the middle of the proposed green wedge - which would be a contradiction. This proposal would urbanise the open countryside and be the start of coalescence of Llantwit Major Town and Llanmaes Village, which goes against Welsh Government policies.

Full text:

This would sit in the middle of the proposed green wedge - which would be a contradiction. This proposal would urbanise the open countryside and be the start of coalescence of Llantwit Major Town and Llanmaes Village, which goes against Welsh Government policies.

Change suggested by respondent:

There should be NO retail floorspace occupying this site. Town Centres should be the focus for new retail space, not out of Town locations like this.

Sound: No

Attachments: None

5383 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Carmel Meredith [3245]

Summary:

I object to Proposal Number SP12[2] for the following reasons:
This will result in the visual and physical coalescence of the Village of Llanmaes and the town of Llantwit Major.
The site is situated outside the RDLP's defined Strategic Growth Area.
The location is incongruous within the setting of the Green Wedge.
This large aesthetically displeasing store and supporting structures would be a major and significant intrusion into the countryside and would clearly be detrimental to the Llanmaes Village Conservation Area.

Full text:

I object to Proposal Number SP12[2] for the following reasons:
This will result in the visual and physical coalescence of the Village of Llanmaes and the town of Llantwit Major.
The site is situated outside the RDLP's defined Strategic Growth Area.
The location is incongruous within the setting of the Green Wedge.
This large aesthetically displeasing store and supporting structures would be a major and significant intrusion into the countryside and would clearly be detrimental to the Llanmaes Village Conservation Area.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5431 Object

Document Element: Land at Bridge House Farm,

Respondent: Mr Chris Moreton [1338]

Summary:

Object Lidl proposal contravenes planning guidelines and Welsh Government policy.

Full text:

Object Lidl proposal contravenes planning guidelines and Welsh Government policy.

Change suggested by respondent:

Reject the Lidl proposal.

Sound: No

Attachments: None

5435 Object

Document Element: Land at Bridge House Farm,

Respondent: Mr Chris Moreton [1338]

Summary:

This proposal contravenes Welsh Government planning guidelines and policy. It also contravenes the Council's Wellbeing Objectives set under the Wellbeing of Future Generations Act.

Full text:

This proposal contravenes Welsh Government planning guidelines and policy. It also contravenes the Council's Wellbeing Objectives set under the Wellbeing of Future Generations Act.

Change suggested by respondent:

Reject the Lidl proposal

Sound: No

Attachments: None

5444 Comment

Document Element: Land at Bridge House Farm,

Respondent: Mr Darren Williams [2292]

Summary:

The town needs a large supermarket but not at this location. The road just before the lights is dangerous and narrow with several near misses every day as cars enter the village. Having a supermarket here would attract more cars and enhance the dangers

Full text:

The town needs a large supermarket but not at this location. The road just before the lights is dangerous and narrow with several near misses every day as cars enter the village. Having a supermarket here would attract more cars and enhance the dangers

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5570 Object

Document Element: Land at Bridge House Farm,

Respondent: Ms Samantha Hall [1432]

Summary:

The approval of this application by the Vale Planning committee breaches many of the Vale and Welsh Government's own policies such as town centre first, place making and non-coalescence. It will open the doors to future development on green spaces if approved and change the character of the area beyond recognition.

Full text:

The approval of this application by the Vale Planning committee breaches many of the Vale and Welsh Government's own policies such as town centre first, place making and non-coalescence. It will open the doors to future development on green spaces if approved and change the character of the area beyond recognition.

Change suggested by respondent:

This area should be allocated as a green wedge to preserve the countryside and keep Llanmaes separate from Llantwit Major.

Sound: No

Attachments: None

5638 Object

Document Element: Land at Bridge House Farm,

Respondent: Mr Derek Massey [3323]

Summary:

I strongly OBJECT to this site being used. The site is situated outside of the RLDP's defined strategic growth area and not in keeping with the visual and physical coalescence between the small Village of Llanmaes and the Town of Llantwit Major. A large retail store located on a greenfield site, in a green wedge, next to the Llanmaes conservation area would be a major intrusion and cause an irreversible scar on the ancient surrounding countryside. Where retail store space is needed, surely this should be within WG town centre first policy, otherwise brownfield such as Llandow Trading Estate.

Full text:

I strongly OBJECT to this site being used. The site is situated outside of the RLDP's defined strategic growth area and not in keeping with the visual and physical coalescence between the small Village of Llanmaes and the Town of Llantwit Major. A large retail store located on a greenfield site, in a green wedge, next to the Llanmaes conservation area would be a major intrusion and cause an irreversible scar on the ancient surrounding countryside. Where retail store space is needed, surely this should be within WG town centre first policy, otherwise brownfield such as Llandow Trading Estate.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5652 Object

Document Element: Land at Bridge House Farm,

Respondent: Mr Eamonn McGreevy [3326]

Summary:

1) Visual and physical coalescence of Llantwit Major and Llanmaes.
2) Outside RLDP's defined Strategic Growth Area.
3) Incongruous within the setting of the Green Wedge>
4) Intrusion into the countryside
5) Detrimental to Llanmaes Conservation Area.

Full text:

1) Visual and physical coalescence of Llantwit Major and Llanmaes.
2) Outside RLDP's defined Strategic Growth Area.
3) Incongruous within the setting of the Green Wedge>
4) Intrusion into the countryside
5) Detrimental to Llanmaes Conservation Area.

Change suggested by respondent:

Please cancel this plan entirely for all the reasons above.

Sound: No

Attachments: None

5673 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Laura McGreevy [3330]

Summary:

Re Retail - Land at Bridge House Farm:
I object to ANY development on this land for the following reasons:
1) This will result in visual and physical coalescence of Llantwit Major and Llanmaes.
2) It is outside RLDP's defined Strategic Growth Area.
3) It is incongruous within the setting of the Green Wedge.
4) I would be a HUGE intrusion into the countryside, and for the residents of Llanmaes Village.
5) It would be detrimental to Llanmaes Conservation Area.

Full text:

Re Retail - Land at Bridge House Farm:
I object to ANY development on this land for the following reasons:
1) This will result in visual and physical coalescence of Llantwit Major and Llanmaes.
2) It is outside RLDP's defined Strategic Growth Area.
3) It is incongruous within the setting of the Green Wedge.
4) I would be a HUGE intrusion into the countryside, and for the residents of Llanmaes Village.
5) It would be detrimental to Llanmaes Conservation Area.

Change suggested by respondent:

I would like the entire Lidl project to be completely overturned / declined!

Sound: No

Attachments: None

5730 Object

Document Element: Land at Bridge House Farm,

Respondent: Mr Graeme Smith [3029]

Summary:

I object to this designation noting that it as a tentative designation pending a decision on a Called In Planning Application. Reasons for this objection include the resulting visual and physical coalescence of the Town of Llantwit Major and Village of Llanmaes. This site is also unsuitable for a large development on this scale as it is situated outside the defined Strategic Growth Area. The proposed supermarket will be highly incongruous within the setting of the proposed Green Wedge although we understand the reasons for this tentative allocation.The large store and supporting structures would be major and significant intrusions into the countryside and would be clearly detrimental to the Llanmaes Conservation Area as detailed and specified in its adopted Management Plan.

Full text:

I object to this designation noting that it as a tentative designation pending a decision on a Called In Planning Application. Reasons for this objection include the resulting visual and physical coalescence of the Town of Llantwit Major and Village of Llanmaes. This site is also unsuitable for a large development on this scale as it is situated outside the defined Strategic Growth Area. The proposed supermarket will be highly incongruous within the setting of the proposed Green Wedge although we understand the reasons for this tentative allocation.The large store and supporting structures would be major and significant intrusions into the countryside and would be clearly detrimental to the Llanmaes Conservation Area as detailed and specified in its adopted Management Plan.

Change suggested by respondent:

Explicitly exclude this site for a retail allocation

Sound: No

Attachments: None

5736 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Linda Green [1072]

Summary:

This proposed development is subject to call in by Welsh Government. The Planning Officer recommended refusal on the basis of impact on the open countryside. In addition, development here will irrevocably impact the village (and nearby town centre) and undoubtedly result in the coalescence both physical and visual of Llantwit Major and Llanmaes. This area is outside the strategic growth area. Further, it will fundamentally impact the conservation area and does not fit with the agreed management plan thereof.

Full text:

This proposed development is subject to call in by Welsh Government. The Planning Officer recommended refusal on the basis of impact on the open countryside. In addition, development here will irrevocably impact the village (and nearby town centre) and undoubtedly result in the coalescence both physical and visual of Llantwit Major and Llanmaes. This area is outside the strategic growth area. Further, it will fundamentally impact the conservation area and does not fit with the agreed management plan thereof.

Change suggested by respondent:

Reject the retail development and endorse the green wedge application to protect the village from sustained development proposals. These are very stressful for the local community as well as being extremely time consuming and expensive to oppose.

Sound: No

Attachments: None

5748 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Jacqueline Wright [3349]

Summary:

I OBJECT TO THIS PROPOSAL ON THE GROUNDS IF IG WERE TO GO AHEAD IT WILL RESULT IN THE PHYSICAL COALESCENCE OF THE TOWN OF LLANTWIT MAJOR AND VILLAGE OF LLANMAES. IT IS ALSO SITUATED OUTSIDE THE RLDP'S DEINED STRATEGIC GROWTH AREA. THE LOCATION IS INCONGRUOUS WITHIN THE SETTING OF THE GREEN WEDGE, THE LARGE SETORE AND SUPPORTING STRUCTURED WOULD BE MAJOR AND SIGNIFICANT INTRUSIONS INTO THE COUNTRYSIDE AND, IT WOULD BE CLEARLY DETRIMENTAL TO THE LLANMAES CONSERVATION AREA

Full text:

I OBJECT TO THIS PROPOSAL ON THE GROUNDS IF IG WERE TO GO AHEAD IT WILL RESULT IN THE PHYSICAL COALESCENCE OF THE TOWN OF LLANTWIT MAJOR AND VILLAGE OF LLANMAES. IT IS ALSO SITUATED OUTSIDE THE RLDP'S DEINED STRATEGIC GROWTH AREA. THE LOCATION IS INCONGRUOUS WITHIN THE SETTING OF THE GREEN WEDGE, THE LARGE SETORE AND SUPPORTING STRUCTURED WOULD BE MAJOR AND SIGNIFICANT INTRUSIONS INTO THE COUNTRYSIDE AND, IT WOULD BE CLEARLY DETRIMENTAL TO THE LLANMAES CONSERVATION AREA

Change suggested by respondent:

THE STORE WOULD BE BETTER PLANNED BEING BUILT OFF THE NORTHERN ACCESS ROAD WHERE IT WOULD BETTER SERVICE THE RESIDENTS OF LLANTWIT MAJOR, ST ATHAN, LLANTWIT MAJOR AND COWBRIDGE BY WAY OF A MAJOR ROAD

Sound: No

Attachments: None

5768 Object

Document Element: Land at Bridge House Farm,

Respondent: Rik Stevens [3360]

Summary:

I would like to register my objection to the proposed retail development at Bridge House Farm.
The proposed store would represent a significant and inappropriate intrusion into the countryside and would undermine the purpose of the proposed Green Wedge. In particular:
- The development would contribute to the visual and physical coalescence of Llantwit Major and Llanmaes.
- It would introduce a large-scale retail building and associated infrastructure into a sensitive rural setting.
- The proposal would be incongruous with the landscape character of the area and detrimental to the setting of the Llanmaes Conservation Area.
- The site lies outside the defined Strategic Growth Area, making it an unsuitable location for this type of development.
For these reasons I strongly urge the Council to reject the allocation of this site for retail development.

Full text:

I am writing in response to the Replacement Local Development Plan (RLDP) consultation regarding proposals affecting Llanmaes.

Green Wedge – Land between Llantwit Major and Llanmaes Site ID 436 – Proposal Number DNP2(6)

I would like to express my support for the proposal to designate the land between the Village of Llanmaes and the Llantwit Major Bypass as a Green Wedge. Maintaining this land as protected open space is important in order to:

- Prevent the visual and physical coalescence of Llantwit Major and Llanmaes
- Protect the rural setting and landscape character of the area
- Preserve the setting of the Llanmaes Conservation Area
- Safeguard countryside from incremental development pressures

Designating this land as a Green Wedge is a sensible and necessary planning measure to ensure the long-term separation and identity of the two settlements and to maintain the character of the surrounding countryside.

Retail Development – Bridge House Farm
Site ID 379 – Proposal Number SP12(2)

I would like to register my objection to the proposed retail development at Bridge House Farm.

The proposed store would represent a significant and inappropriate intrusion into the countryside and would undermine the purpose of the proposed Green Wedge. In particular:

- The development would contribute to the visual and physical coalescence of Llantwit Major and Llanmaes.
- It would introduce a large-scale retail building and associated infrastructure into a sensitive rural setting.
- The proposal would be incongruous with the landscape character of the area and detrimental to the setting of the Llanmaes Conservation Area.
- The site lies outside the defined Strategic Growth Area, making it an unsuitable location for this type of development.

For these reasons I strongly urge the Council to reject the allocation of this site for retail development.

Thank you for considering these comments as part of the consultation process.

Change suggested by respondent:

Remove allocation.

Sound: Not specified

Attachments:

Email Representations - Redacted - https://valeofglamorgan.oc2.uk/a/t5j

5779 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Sue Stevens [2287]

Summary:

I object to the proposed retail development at Bridge House Farm (Site ID 379 – Proposal SP12(2)). The scale and nature of the development would represent a significant intrusion into the countryside, contribute to the merging of Llantwit Major and Llanmaes, and be harmful to the landscape and the setting of the Llanmaes Conservation Area. The site is also outside the RLDP's defined Strategic Growth Area.

Full text:

I support the designation of the Green Wedge between Llanmaes and Llantwit Major (Site ID 436 – Proposal DNP2(6)). Protecting this land is important to prevent the visual and physical coalescence of the two settlements, maintain the rural character of the area, and preserve the setting of the Llanmaes Conservation Area.

I object to the proposed retail development at Bridge House Farm (Site ID 379 – Proposal SP12(2)). The scale and nature of the development would represent a significant intrusion into the countryside, contribute to the merging of Llantwit Major and Llanmaes, and be harmful to the landscape and the setting of the Llanmaes Conservation Area. The site is also outside the RLDP's defined Strategic Growth Area.

For these reasons I urge the Council to support the Green Wedge designation and reject the retail allocation at Bridge House Farm.

Change suggested by respondent:

Remove allocation.

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/t6v

5812 Object

Document Element: Land at Bridge House Farm,

Respondent: Mr Paul Garvey [3241]

Summary:

The second is the proposed retail development at Bridge House Farm It is the set of the proposed Lidl development which has been Called in by the Government. This is totally out of keeping with national plans.

Full text:

I live in Llanmaes and three things affect us directly from the RLDP and I'd like to comment on all three, if I may.

The first is the proposed Green Wedge between Llantwit Major and Llamaes. I very much support this proposal and the Llanmaes Community Council and the vast majority, if not all of our village does too. It fits very well with the National Plans for keeping the integrity of our precious Welsh villages. It would keep Lllanmaes safe from development, as per the adopted Management plan.

The second is the proposed retail development at Bridge House Farm It is the set of the proposed Lidl development which has been Called in by the Government. This is totally out of keeping with national plans.

The third is the need for flood alleviation in Llanmaes, Again, this would be much needed.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5827 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Julie Massey [3390]

Summary:

I strongly object to this site being used. The site is situated outside the RLDP's defined strategic growth area and not in keeping with the visual and physical coalescence between the small village of Llanmaes and the town of Llantwit Major. A large retail store located on a greenfield site, in a green wedge, next to the Llanmaes conservation area would be a major intrusion and cause an irreversible scar on the ancient surrounding countryside. Where retail store space is needed this should be within the WG town centre first policy, otherwise brownfields such as the former RAF NAFFI complex.

Full text:

I strongly object to this site being used. The site is situated outside the RLDP's defined strategic growth area and not in keeping with the visual and physical coalescence between the small village of Llanmaes and the town of Llantwit Major. A large retail store located on a greenfield site, in a green wedge, next to the Llanmaes conservation area would be a major intrusion and cause an irreversible scar on the ancient surrounding countryside. Where retail store space is needed this should be within the WG town centre first policy, otherwise brownfields such as the former RAF NAFFI complex.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5830 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Caroline Smith [3388]

Summary:

I object to this designation due to these concerns: the coalescence of the village of Llanmaes with the town of Llantwit Major, the incongruity of a major urban structure sitting on a proposed green wedge which would dominate the view of the Llanmaes conservation area and countryside, and the potential of increased traffic through the village.

Full text:

I object to this designation due to these concerns: the coalescence of the village of Llanmaes with the town of Llantwit Major, the incongruity of a major urban structure sitting on a proposed green wedge which would dominate the view of the Llanmaes conservation area and countryside, and the potential of increased traffic through the village.

Change suggested by respondent:

To find another site that is more in keeping with a large store, its associated structures and resultant traffic.

Sound: No

Attachments: None

5856 Object

Document Element: Land at Church Farm, St

Respondent: Mr Jeff Smith [3399]

Summary:

wrong location within the development - would be better placed in the Phase 2 access point onto the coast road to increase passing trade and remove the bottle neck from the village.

Full text:

wrong location within the development

Change suggested by respondent:

-

Sound: No

Attachments: None

5871 Object

Document Element: Land at Bridge House Farm,

Respondent: Ms Ann Barnaby [1702]

Summary:

This site was previously rejected as does not fit with a number of planning policies. The planning application which is still under review by the Planning Inspector - should not impact its inclusion in this LDP if it is still not compiling with planning policy, it should not be included, as this could set a precedent for other applications.

Full text:

This plot was put forward in the previous LDP for a retail store, it was refused and the Planning Inspector agreed that development of this site would be against a number of planning policies - while I appreciate in the meantime an application was brought forward which the planning committee approved against advise of the planning officers - nothing has changed regard the issues with it being against planning policy.
While the local lobbying was for a Lidl store - the location is not suitable and to build against planning policy would set a precedent to future applications.
In addition the planning application was flawed with a number of important impacts particularly to traffic movements on the local area and the near by junction with the B4265 were not fully represented.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5901 Comment

Document Element: Land at Church Farm, St

Respondent: Mrs Louise Jenkins [2079]

Summary:

You propose an Aldi in the middle of the village. There are already 3 convenience shops in the village and the Aldi website says they will not build in the centre of a village. Why not build a roundabout into the estate by the petrol station and place the Aldi there. This will greatly reduce its impact on the existing shops and reduce traffic through the village.

Full text:

You propose an Aldi in the middle of the village. There are already 3 convenience shops in the village and the Aldi website says they will not build in the centre of a village. Why not build a roundabout into the estate by the petrol station and place the Aldi there. This will greatly reduce its impact on the existing shops and reduce traffic through the village.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5939 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Susan Tandy [1626]

Summary:

Retail - Land at Bridge House Farm Site ID 379, Proposal Number SP12 (2)
I completely disagree that this land should be used for retail purposes, because such a retail development would result in the very coalescence the community council seeks to prevent and would be out of keeping within the proposed green wedge.

Full text:

Conservation/Green Wedge Site ID 436. Proposal Number DNP2(6)
I fully support the adoption of this site as a green wedge between Llantwit and Llanmaes, in order to protect this area of rural land against urban encroachment and to prevent coalescence between the town of Llantwit ad the village of Llanmaes.
Retail - Land at Bridge House Farm Site ID 379, Proposal Number SP12 (2)
I completely disagree that this land should be used for retail purposes, because such a retail development would result in the very coalescence the community council seeks to prevent and would be out of keeping within the proposed green wedge.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/t9f

5948 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Janet Harris [1846]

Summary:

This proposed development, currently subject to a 'Call In' by the Welsh government is at clashing odds with the village and rural community setting of Llanmaes. The large store and supporting structures and developments would be significant intrusions into the countryside and would result in the physical and visual coalescence of a small rural village with the town of Llantwit Major. It represents a significant intrusion into the countryside, is at odds with the proposal of a green wedge to protect the rural setting of the village and would be clearly detrimental to the Llanmaes Conservation Area. It is outside the RLDP's Strategic Growth Area.

Full text:

As a resident of the village of Llanmaes for the last 37 years, I would like to make the following comments:
Flood Alleviation
There is a desperate need for not just a flood alleviation plan, but action to protect the residents of Llanmaes from the continuing effects of flooding in the area. More properties have been affected this year. Recently our own 400-year-old property, which has never been previously affected was subjected to a backlog of sewage from the main sewer in the road on which we live. Fortunately, a manhole on our drive gave way under the pressure, releasing water and sewage down the road. Otherwise, like other properties in the village we would be at risk of the property itself flooding with sewage.
I would call upon both the Vale of Glamorgan Council and the Welsh Government to come up with a coherent, joined up plan and solution to this long running problem and implement it with urgency.
No building should be allowed in the village until a solution has been completed, there is too much risk to existing properties.
Retail - Land at Bridge Farm House site ID 379 Proposal Number SP12(2)
This proposed development, currently subject to a 'Call In' by the Welsh government is at clashing odds with the village and rural community setting of Llanmaes. The large store and supporting structures and developments would be significant intrusions into the countryside and would result in the physical and visual coalescence of a small rural village with the town of Llantwit Major. It represents a significant intrusion into the countryside, is at odds with the proposal of a green wedge to protect the rural setting of the village and would be clearly detrimental to the Llanmaes Conservation Area. It is outside the RLDP's Strategic Growth Area.
Green Wedge/Conservation. Land Between Llantwit Major and Llanmaes Site D436 Proposal Number DNP2(6)
I would strongly support the proposal for a 'green wedge' for the land between the village of Llanmaes and the Llantwit major bypass, but this should also include the land currently under proposal for the above retail development site. This would protect this land from further hostile development proposals, protect the intrusion into the countryside and the setting of the Llanmaes Conservation Area and protect the village against physical and visual coalescence with a town, protecting its rural and village character. It would protect the setting of the Llanmaes Conservation Area as per the adopted Management Plan.
I would be grateful if these comments could be duly noted and considered.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/t9p

6024 Comment

Document Element: Land at Bridge House Farm,

Respondent: Mr & Mrs Alison and Richard Leach [2143]

Summary:

I see that the Planning policy has ring fenced the location of the proposed Lidl development (ID 379 Proposal number SP12(2) that is currently called in by the Welsh government and we are awaiting a date when the inspector is holding his enquiry in to this. You will be aware that the Planning committee voted against the recommendation of the planning officer. when they made there decision, that is now being challenged as procedurally against a lot of Vale and Welsh Government policies.

Full text:

I see that the Planning policy has ring fenced the location of the proposed Lidl development (ID 379 Proposal number SP12(2) that is currently called in by the Welsh government and we are awaiting a date when the inspector is holding his enquiry in to this. You will be aware that the Planning committee voted against the recommendation of the planning officer. when they made there decision, that is now being challenged as procedurally against a lot of Vale and Welsh Government policies.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/4rr

6028 Object

Document Element: Land at Bridge House Farm,

Respondent: Mr Richard Cobourne [3440]

Summary:

I am deeply concerned about the survival of Llantwit Major and its local shops, Post Office, chemists, charity shops, and hairdressers, as well as existing supermarkets. I believe an out-of-town supermarket would severely reduce footfall in the town centre, leading to shop closures, boarded-up premises, and loss of livelihoods. Drawing on examples like Chepstow, I fear the town's vitality would decline, and the community would be permanently damaged. I urge the council and planners to protect the town's unique environment and ensure its future vibrancy.

Full text:

My main concern is for the survival of the town of Llantwit Major and its small owner-managed shops, Post Office, chemists, charity shops, hairdressers, etc. And to some extent existing supermarkets. I am also concerned about maintaining green spaces and conservation areas as per the adopted Management Plan.

Building an 'out of town' supermarket will significantly and detrimentally affect footfall to the town centre — people who use the current town centre retail and hospitality opportunities simply will not visit as they will be parked away from them and will not return. The town will slowly die. Shops and other premises will be boarded up. Livelihoods will be lost.

Time-and-again we have seen many towns across Wales and the rest of the UK suffer. Simple desk-based research will reveal many.

Taking one town as an example — Chepstow. Tesco built a supermarket about 150 metres from Chepstow high street across a main road — not dissimilar to the situation in Llantwit Major / Llanmaes. Few visit Chepstow high street so the town itself is dying. Shops and other premises have closed, remaining empty for years — and at a time when retail outlets are increasingly under pressure from on-line shopping.

The council and planners must do everything it can to ensure that Llantwit Major remains a vibrant and varying environment for generations to come — providing employment and facilities for all to enjoy.

Building out-of-town will destroy the community of Llantwit Major for ever.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3xq

6052 Object

Document Element: Land at Bridge House Farm,

Respondent: Mr Philip Taylor [3439]

Summary:

This development is a major intrusion into the countryside. It merges Llantwit Major and Llanmaes in a way that is contradictory to the setting of the Green Wedge and the Llanmaes Conservation Area. It totally ignores environmental and traffic considerations. This ‘field by field’ development strategy is completely changing our towns, villages and countryside with reckless abandon at a time when we require food security and sustainable living.

Full text:

This development is a major intrusion into the countryside. It merges Llantwit Major and Llanmaes in a way that is contradictory to the setting of the Green Wedge and the Llanmaes Conservation Area. It totally ignores environmental and traffic considerations. This ‘field by field’ development strategy is completely changing our towns, villages and countryside with reckless abandon at a time when we require food security and sustainable living.

Change suggested by respondent:

The plan requires a focus on small scale development everywhere combined with an appropriate increase in existing infrastructure.

Sound: No

Attachments: None

6071 Object

Document Element: Land at Bridge House Farm,

Respondent: Andrew Jack [3465]

Summary:

I oppose RLDP ID 379 Proposal SP12(2) due to safety concerns regarding the access road to the Lidl development, which could endanger traffic in Llanmaes and on the B-4265, as well as cyclists, pedestrians, and local residents. The road between the bypass and Llanmaes is used extensively by cyclists as it is on the recognised cycleway to Ewenny and the footpath is used by many school children and runners. Therefore it sonly a matter of time before the junction's design risks serious accidents.

Full text:

I wish to oppose RLDP ID 379 Proposal Number SP12(2), on the grounds of the position and proposed access road to and from this Lidle development will be a major safety concern and danger both to the traffic through the village of Llanmaes and to the traffic on the Llantwit Major bypass B-4265. The current Llanmaes village traffic consists of mainly light vehicles and some HGV, whilst the B-4265 is increasingly HGV, supplying quarried materials to Aberthaw Cement works. Both roads are used extensively by cyclists particularly through the village since this is the recognised Vale cycleway to Ewenny. The single footpath through the village to the traffic light controlled crossings is more importantly the main route used by pedestrians both residents and visitors, including local school children going to and from the schools in Llantwit Major, plus many runners and walkers from the larger recreational areas. In addition there are stables and a riding school just before the exit of the village with the junction with the B-4265. I am of the opinion that as indicated on the Lidl proposal it will only be a matter of time before serious accidents, injuries and fatalities will occur.

Additionally I support Proposal Number ID 436 Number DNP2 (6), for the Conservation /Green Wedge to prevent the coalescence of Llanmaes and Llantwit Major and hence preserve the unique village amenity of the Llanmaes setting which is enjoyed by residents of both locations and the many walkers,runners and cyclists who daily frequent the village and adjoining countryside.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/3t4

6101 Object

Document Element: Land at Bridge House Farm,

Respondent: Richard Hughes [3475]

Summary:

The proposed Lidll development should be rejected for the following reasons:
It would introduce a coalescence of town and Village, an action that goes against present policy. The coalescing effect would be accentuated by the increased traffic, the increase in visitors and the negative effects such as littering that would accompany greater human presence.
It would be situated outside the RLDP's defined Strategic Growth Area.
It would mark a major intrusion into the countryside, visually and in terms of human movement.
It may be the case that, especially with prospect of 500 houses to be built near St Athan, that an additional supermarket might be necessary to meet the needs of the growing population. It doesn't make more sense to site the development in Green Wedge land, on a difficult corner, resulting in an inevitable increase in traffic, a loss of countryside and adding a visual plight to the local perspective.

Full text:

I would like to submit comments with regard to the consultation process on the Deposit (Draft) Plan for the RLDP.

Conservation/ Green Wedge. Site ID 436 Proposal Number DNP2(6)

All of the land between the village of Llanmaes and the Llantwit Major by-pass should be dedicated to a Green Wedge and thus exempted from any development. It is important to resist a coalescence between town and village. Any single development would undermine the principle of countryside protection and provide a precedent for further intrusions. The Llanmaes Conservation area should be protected. I understand that, at present, the site of the proposed retail development is unprotected, pending the outcome of the Inquiry. Granting permission for the store to be developed would undermine, render pointless the idea of coalescence-avoidance and countryside protection.

Retail - Land at Bridge House Farm Site ID 379 Proposal Number SP12(2)

The proposed Lidll development should be rejected for the following reasons:

It would introduce a coalescence of town and Village, an action that goes against present policy. The coalescing effect would be accentuated by the increased traffic, the increase in visitors and the negative effects such as littering that would accompany greater human presence.

It would be situated outside the RDLP's defined Strategic Growth Area.

It would mark a major intrusion into the countryside, visually and in terms of human movement.

It may be the case that, especially with prospect of 500 houses to be built near St Athan, that an additional supermarket might be necessary to meet the needs of the growing population. It doesn't make more sense to site the development in Green Wedge land, on a difficult corner, resulting in an inevitable increase in traffic, a loss of countryside and adding a visual plight to the local perspective.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/td4

6126 Object

Document Element: Land at Bridge House Farm,

Respondent: Ms Ann Barnaby [1702]

Summary:

While the owner of this land is obviously desperate to make a large profit, this should not be a reason or foundation for planning.
This site should be kept as a green wedge between Llantwit Major & Llanmaes

Full text:

While the owner of this land is obviously desperate to make a large profit, this should not be a reason or foundation for planning.
This site should be kept as a green wedge between Llantwit Major & Llanmaes

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6143 Object

Document Element: Land at Bridge House Farm,

Respondent: Ms Ann Barnaby [1702]

Summary:

I have not been able to find this site in the candidate sites for information at to the proposal! It is also part of another allocation as a 'green wedge', which I am in total support of. Much of this site is a low valley sloping down to Llanmaes brook which is a rich and diverse wildlife corridor proven during many surveys to contain Otters amongst many others. Any development in this area would cause a coalescence of the settlements.

Full text:

I have not been able to find this site in the candidate sites for information at to the proposal! It is also part of another allocation as a 'green wedge', which I am in total support of the proposed new area at Llantwit Major/Llanmaes LM1 much of this site is a low valley sloping down to Llanmaes brook which is a rich and diverse wildlife corridor proven during many surveys to contain Otters amongst many others. Any development in this area would cause a coalescence of the settlements.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6146 Object

Document Element: Land at Bridge House Farm,

Respondent: Ms Ann Barnaby [1702]

Summary:

This site is also to be considered as 'green wedge' which I would support. I would object strongly to any proposal for development of this site for housing or retail.

Full text:

I have not been able to find this site in the candidate sites for information at to the proposal! So assume the land owner is just desperate to make more money!! All I can say is it is also part of another allocation as a 'green wedge', which I am in total support of the proposed new area at Llantwit Major/Llanmaes LM1 much of this site is a low valley sloping down to Llanmaes brook which is a rich and diverse wildlife corridor proven during many surveys to contain Otters amongst many others. Any development in this area would cause a coalescence of the settlements, so would object to it being brought forward for housing or retail.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6205 Object

Document Element: Land at Bridge House Farm,

Respondent: Mr Colin Arnold [2871]

Summary:

I strongly oppose this proposal despite its call-in by the Welsh Government. I believe the 'urban creep' from Llantwit Major to Llanmaes would harm the rural village and Llanmaes Conservation Area, causing significant disruption during construction and operation. The claim that many shoppers would walk is unsubstantiated, as the large car park suggests most would drive, increasing traffic off the bypass and impacting the conservation area. The site is outside the strategic growth area and conflicts with the green wedge, intruding into the countryside.

Full text:

I object strongly to this proposal even though I understand it has now been called in by the Welsh Government. This 'urban creep' from Llantwit Major to Llanmaes should not be allowed due to the impact on the rural village and the Llanmaes Conservation Area. There would be significant disruption both during the build phase and once a store is operational. I do not believe that a significant number of shoppers would be walking to store as was alledged during the planning application. As far as I aaware no questions were put forward to the developers as to the percentage of shoppers that walk to a store in a similar existing location. The size of the car park would appear to suppot the theory that the majority of shoppers would drive. This additional vehicle activity coming off the Llantwit Major bypass and through Llanmaes itself would be detrimental to the Llanames Conservation area. This site is outside of the current LDP strategic growth area; the proposal is oncongruent with the green wedge proposed and it would represent a major intrusion into the countryside.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6210 Object

Document Element: Land at Bridge House Farm,

Respondent: Mr Phil Tandy [1625]

Summary:

Site ID379 Proposal Number SP12(2)
I strongly oppose the proposal for a Lidl store on this site. The proposal is incongruous with the Green Wedge, would cause significant traffic congestion in the area. It would intrude on the countryside and also be detrimental to the Llanmaes Conservation Area.

Full text:

Site ID 436 Proposal Number DNP2(6).
I support the proposal that the land between the village of Llanmaes and the Llantwit Major bypass be designated as a Green Wedge and protected from development. This will avoid degradation of the countryside and help to preserve the village character of Llanmaes and its Conservation Area.

Site ID379 Proposal Number SP12(2)
I strongly oppose the proposal for a Lidl store on this site. The proposal is incongruous with the Green Wedge, would cause significant traffic congestion in the area. It would intrude on the countryside and also be detrimental to the Llanmaes Conservation Area.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6226 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Jan Arnold [3499]

Summary:

I object because it does not fit in with the green wedge, it does not fit in a rural setting which is also a conservation area and it is outside the designated Strategic Growth area. There are far better options for the store within the RLDP without again starting to merge Llantwit Major and Llanmaes. It is even more anomalous given that with the new boundary changes Llanmaes is aligned with 3 other small rural villages and not the large town of Llantwit Major.

Full text:

I object because it does not fit in with the green wedge, it does not fit in a rural setting which is also a conservation area and it is outside the designated Strategic Growth area. There are far better options for the store within the RLDP without again starting to merge Llantwit Major and Llanmaes. It is even more anomalous given that with the new boundary changes Llanmaes is aligned with 3 other small rural villages and not the large town of Llantwit Major.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6257 Object

Document Element: Land at Bridge House Farm,

Respondent: Mr Noel Harris [2148]

Summary:

I oppose the proposed retail development at Bridge Farm House, which is currently 'Call In' by the Welsh government. I believe the large store and supporting structures would intrude on the countryside, threaten the village's rural character, and cause coalescence with Llantwit Major. The development conflicts with the green wedge protecting Llanmaes, would harm the Llanmaes Conservation Area, and lies outside the RLDP's Strategic Growth Area.

Full text:

Retail - Land at Bridge Farm House site ID 379 Proposal Number SP12(2)

This proposed development, currently subject to a 'Call In' by the Welsh government is at clashing odds with the village and rural community setting of Llanmaes. The large store and supporting structures and developments would be significant intrusions into the countryside and would result in the physical and visual coalescence of a small rural village with the town of Llantwit Major. It represents a significant intrusion into the countryside, is at odds with the proposal of a green wedge to protect the rural setting of the village and would be clearly detrimental to the Llanmaes Conservation Area. It is outside the RLDP's Strategic Growth Area.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3j6

6267 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Bethan Pocock [3268]

Summary:

In 2022 Lidl submitted a planning application for a supermarket on a parcel of land which had in the past been part of Bridge House Farm. The farmhouse itself had stood vacant for a number of years until it was recently purchased and is being restored as a family home.
The application attracted a great deal of concern and objections based on the fact that this development would result in both visual and physical coalescence between Llanmaes and Llantwit Major. Its entrance would be directly off the main access lane to Llanmaes, close to the main road junction, managed by traffic lights and pedestrian crossing.
The planners at the Vale of Glamorgan recommended refusal of this application based on the fact that the site was outside the RLDP's defined strategic growth area and other associated concerns. However at the planning meeting, a small number of Councilors argued in favour of the development, based on the need for 'cheap food', and as such the application was approved. Since this meeting, the application has been referred to PEDW, and their initial assessment that an appeal should be heard, the application has been escalated to a full enquiry at great expense to all parties. This 'cheap food ' option not quite such a special offer after all.
In order to overcome the situation that this overturning of the planners' recommendation has created, a simple remedy would be for the Welsh Government to offer an alternative site to Lidl. The nearby Northern Access road which was built at considerable cost to the taxpayer for commercial and residential development has easy access, pedestrian and cycle way, together with Bus stops with shelters, though no current bus route. A Win / Win solution.
Our rural communities deserve to be maintained for the wellbeing not only of the residents, but the environment as a whole. Llanmaes enjoys an abundance of wildlife which needs to be preserved. Seeing a pheasant alongside a woodpigeon crossing the road restores one's faith in our surroundings. Alongside the acres of wheat and corn, they need those green field sites as do we.

Full text:

Retail - Land at Bridge House Farm Site ID 379 Proposal Number SP12(2)
In 2022 LIDL submitted a planning application for a supermarket on a parcel of land which had in the past been part of Bridge House Farm. The farmhiuse itself had stood vacant for a number of years until it was recently purchased and is being restored as a family home.
The application attracted a great dea of concern and objetions based on the fact that this development would result in both visual and physical coalescence between Llanmaes and Llantwit Major. Its entrance would be directly off the main access lane to Llanmaes, close to the main road junction,managed by traffic lights and pedestrian crossing.
The planners at the Vale of Glamorgan recommended refusal of this application based on the the fact that the site was outside the RLDP's defined strategic growth area and other associated concerns. However at the planning meeting, a small number of Councillors argued in favour of the development , based on the need for ' cheap food', and as such the application was approved. Since this meeting , the application has been referred to PEDW, and their initial assessment that an appeal should be heard, the application has been escalated to a full enquiry at great expense to all parties. This ' cheap food 'option not quite such a special offer after all.
In order to overcome the sitution that this overturning of the planners' recommendation has created, a simple remedy would be for the Welsh Government to offer an alternative site to LIDL . The nearby Northen Access road which was built at considerable cost to the taxpayer for commercial and residential development has easy access, pedestrian and cycle way, together with Bus stops with shelters , though no current bus route. A Win / Win solution.

Flood Alleviation
The need for a flood alleviation scheme for Llanmaes is acknowledged on several occasions in the Deposit Plan , thugh unfortunately there are no specific proposals. Having lived in Llanmaes for 7 years, I have whitnessed regular flooding from surface water over the wetter months when the village stream and drains are unable to cope with the volume of water. This water then overwhelms the sewage system in the village resulting in raw sewage flooding a number of homes as well as the village playing field . This flooding also results in road flooding in at least 3 places around the village lanes. This has become an annual occurance, and despite intervention from Welsh Water , the situation has not been resolved. A Welsh Government grant for an alleviation scheme has to date not been implimented and this scheme needs to be revived for the safety of the village residents.
I trust the comments I have made above will be considered with the seriousness they deserve. Our rural communities deserve to be maintained for the wellbeing not only of the residents, but the environment as a whole. Llanmaes enjoys an abundnace of wildlife which needs to be preserved . Seing a pheasant aongside a woodpigeon crossing the road restores one's faith in our surroundings. Alongside the acres of wheat and corn ,they need those green field sites as do we.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3kv

6296 Object

Document Element: Land at Bridge House Farm,

Respondent: Robert Turner [3525]

Summary:

The land between the Village of Llanmaes and the Llantwit Major Bypass should be designated as Green Wedge , us villages don’t won’t Llantwit Major joining our village.
Protects the conservation area as previously mentioned by CADW.
and should restrict building work of any description as this should remain Greenfields for the beauty on views of our countryside and Historical Church.

Full text:

Hi
The land between the Village of Llanmaes and the Llantwit Major Bypass should be designated as Green Wedge , us villages don’t won’t Llantwit Major joining our village .
Protects the conservation area as previously mentioned by CADW .
and should restrict building work of any description as this should remain Greenfields for the beauty on views of our countryside and Historical Church .

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/tfb

6335 Comment

Document Element: Land at Bridge House Farm,

Respondent: Richard Leach [3544]

Summary:

I see that the Planning policy has ring fenced the location of the proposed Lidl development (ID 379 Proposal number SP12(2)) that is currently called in by the Welsh government. You will be aware that the Planning committee voted against the recommendation of the planning officer. when they made there decision, that is now being challenged as procedurally against a lot of Vale and Welsh Government policies. Looking forward to this site being included in the green wedge when this ridiculous decision is over turned.

Full text:

I attended the consultation at CF61 about the RLDP and was advised to write to you with my comments.

I was pleased to see that in the RLDP that the fields adjacent to the LLantwit Major Bypass (site ID 436 Proposal number DN2(6) is designated as a Green wedge That application was made by our Community council and I fully support this proposal. the reasons they gave and I agree with this , are that protection of the open country side, protects against the coalescence of the town and our rural village, and protects the setting of the conservation area.

I see that the Planning policy has ring fenced the location of the proposed Lidl development (ID 379 Proposal number SP12(2) that is currently called in by the Welsh government . You will be aware that the Planning committee voted against the recommendation of the planning officer. when they made there decision, that is now being challenged as procedurally against a lot of Vale and Welsh Government policies. Looking forward to this site being included in the green wedge when this ridicules decision is over turned

I note with interest that several fields to the north east of Llanmaes have been designated as potential solar farm sites. These very fields are partially responsible for the flooding risk in Llanmaes. I suspect that solar farms would not help this problem.

The deferred flood alleviation scheme for Llanmaes affected our land in Siginstone lane. The RLDP mentions this scheme several times but no response has been forth coming. The village floods and for many many years The council and the Welsh government have put in funding in 2023, the Welsh government allocated £3,090,855 and in 24/25 £16,000 to solve this. Nothing has yet happened, indeed in the RLDP it is mentioned extensively that the village floods but we cannot see what specific directions have been made to resolve this problem. I urge the Vale council to liaise with the Welsh government about bringing this forward and mention in the deposit plan.
I appreciate that the costs of the plan increased substantially with the fuel costs of the Ukraine war and probable is increasing again. however parts of the plan , reprofiling the road and channeling flood water away from housing could have made a difference without the extensive earth works in fields referred too above. If my suggestion of extensive tree planting in above fields instead of bunds and channels had been implemented the risks may already be reduced.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/thx

6366 Object

Document Element: Land at Bridge House Farm,

Respondent: Mervyn Page [3558]

Summary:

I believe Picketston Lane should be reviewed due to the large traffic implications from recent applications, especially as it is a single-car lane without a footpath, has garden gates, driveways, and a 60MPH speed limit. The Aston Martin factory application did not include a traffic survey, yet the lane experiences heavy traffic, including lorries searching for industrial units.

Full text:

DNP2(6)
SP12(2)
HG1(5)
HG2(2)
HG2(3)
Application 2025/01139/FUL

I have contacted the planning department previously on 13/1/2026
to ask for the highways traffic analysis on Picketston Lane CF624QP,
to date I have had no response.
With the above applications all having large traffic implications I feel that Picketston Lane being a single car lane come under review.
A traffic survey was not included in the application for the Aston Martin factory and subsequently the lane is subject to large amounts of traffic and regular lorries (lost)looking for industrial units and factories.
The Development Plan for the above will all generate a large amount of traffic of all types.
Please note that Picketston Lane has no footpath and has garden gates opening onto the highway and field/animal access along with driveways and also a national speed limit of 60MPH.
Please advise on the action to be taken.
Yours faithfully

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/tjb

6373 Object

Document Element: Land at Bridge House Farm,

Respondent: Mr Hayden Pocock [3561]

Summary:

In 2022, LIDL proposed building a supermarket on part of Bridge House Farm, which had been vacant and is now being restored. The plan faced objections due to concerns over visual and physical merging of Llanmaes and Llantwit Major, and the location’s proximity to a busy junction. The Vale of Glamorgan recommended refusal because the site was outside the strategic growth area. Despite this, some councillors approved the application without clear reasoning. The case has been referred to PEDW for a full enquiry, which may consider alternative sites such as land near the Northern Access Road.

Full text:

Retail - Land at Bridge House Farm Site ID 379 Proposal Number SP12(2)
In 2022 LIDL submitted a planning application for a supermarket on a parcel of land which had in the past been part of Bridge House Farm. The farmhouse itself had stood vacant for a number of years until it was recently purchased and is being restored as a family home.
The application attracted a great deal of concern and objections based on the fact that this development would result in both visual and physical coalescence between Llanmaes and Llantwit Major. Its entrance would be directly off the main access lane to Llanmaes, close to the main road junction, managed by traffic lights and pedestrian crossing.
The planners at the Vale of Glamorgan recommended refusal of this application based on the the fact that the site was outside the RLDP's defined strategic growth area and other associated concerns. Some councillors chose to ignore the professional assessment of the VoG planning dept. and, without presenting reasoned argument, voted to approve the application.
The application has been referred to PEDW and will be subject to a full enquiry.
The enquiry will surely offer an opportunity to consider locations other the Bridge House Farm site. For example, there is land that borders the Northern Access Road. With the infrastructure for active travel, an existing roundabout for traffic management and closeness to the growing St Athan community this would seem to be a significantly more suitable location for a new retail development.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3my

6377 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Jaqueline Hughes [3563]

Summary:

Retail - Land at Bridge Farm (Site ID379 Proposal Number SP12 (2)]
This Called In planning application by Lidl, having previously been rejected by VOG Planning Officers, should not have been approved and should be excluded from the RLDP. This site is outside the RDLP's Strategic Growth Area, it will blatantly result in the coalescence of town and village and will form a wholly inappropriate intrusion into the Green Wedge and surrounding countryside.
It may be worth noting that time has moved on since this retail site was proposed. The RLDP highlights, as indicated below, the need for such an outlet not in the strikingly appropriate entrance to Llanmaes but in the Strategic Growth Area in which St Athan and Eglwys Brewis sit. This would better serve the requirements of the burgeoning population in this area

Full text:

Retail - Land at Bridge Farm (Site ID379 Proposal Number SP12 (2)]
This Called In planning application by Lidl, having previously been rejected by VOG Planning Officers, should not have been approved and should be excluded from the RLDP. This site is outside the RDLP's Strategic Growth Area, it will blatantly result in the coalescence of town and village and will form a wholly inappropriate intrusion into the Green Wedge and surrounding countryside.
It may be worth noting that time has moved on since this retail site was proposed. The RLDP highlights, as indicated below, the need for such an outlet not in the strikingly appropriate entrance to Llanmaes but in the Strategic Growth Area in which St Athan and Eglwys Brewis sit. This would better serve the requirements of the burgeoning population in this area

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3nr

6388 Object

Document Element: Land at Bridge House Farm,

Respondent: Llanmaes Community Council (Mrs C Alexander, Clerk) [240]

Summary:

2. Retail - Land at Bridge House Farm Proposal Number SP12(2)
Llanmaes Community Council objects to this designation noting that it as a tentative designation pending a decision on a Called In Planning Application). Amongst the reasons for this objection include the resulting visual and physical coalescence of the Town of Llantwit Major and Village of Llanmaes. This site is also unsuitable for a large development on this scale as it is situated outside the RLDP's defined Strategic Growth Area. The proposed supermarket will be highly incongruous within the setting of the proposed Green Wedge although we understand the reasons for this tentative allocation pending a decision to accept or refuse the Called In Planning Application. Finally, the large store and supporting structures would be major and significant intrusions into the countryside and would be clearly detrimental to the Llanmaes Conservation Area as detailed and specified in its adopted Management Plan.

Full text:

2. Retail - Land at Bridge House Farm Proposal Number SP12(2)
Llanmaes Community Council objects to this designation noting that it as a tentative designation pending a decision on a Called In Planning Application). Amongst the reasons for this objection include the resulting visual and physical coalescence of the Town of Llantwit Major and Village of Llanmaes. This site is also unsuitable for a large development on this scale as it is situated outside the RLDP's defined Strategic Growth Area. The proposed supermarket will be highly incongruous within the setting of the proposed Green Wedge although we understand the reasons for this tentative allocation pending a decision to accept or refuse the Called In Planning Application. Finally, the large store and supporting structures would be major and significant intrusions into the countryside and would be clearly detrimental to the Llanmaes Conservation Area as detailed and specified in its adopted Management Plan.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4s4

6409 Object

Document Element: Land at Bridge House Farm,

Respondent: Mr David Harris [2291]

Summary:

Retail - Land at Bridge House Farm Site ID379 Proposal Number SP12(2).
I oppose this proposal for the following reasons:-
This site undermines the whole purpose of creating a green wedge as proposed in proposal number DNP2(6) and discussed above.
The proposal would result in coalescence between the town of Llantwit Major and the village of Llanmaes.
A supermarket building and the supporting infrastructure would be a significant negative impact on the Countryside.
Within the Conservation Management Plan it is stated 'Having designated the Conservation Area, the local authority has a statutory duty to ensure that the character of the area be preserved or enhanced' it further states under General Character and Plan Form '
There is a close relationship between buildings and surrounding countryside, with open fields providing a foil to the built environment. The village is visible in its landscape setting from the by-pass.
Intervening fields to the north of the by-pass form an important element of separation from modern housing estates located on the edge of Llantwit Major'

Full text:

Retail - Land at Bridge House Farm Site ID379 Proposal Number SP12(2).
I oppose this proposal for the following reasons:-
This site undermines the whole purpose of creating a green wedge as proposed in proposal number DNP2(6) and discussed above.
The proposal would result in coalescence between the town of Llantwit Major and the village of Llanmaes.
A supermarket building and the supporting infrastructure would be a significant negative impact on the Countryside.
Within the Conservation Management Plan it is stated ' Having designated the Conservation Area, the local authority has a statutory duty to ensure that the
character of the area be preserved or enhanced' it further states under General Character and Plan Form ' There is a close relationship between buildings and surrounding countryside, with open fields providing a foil to the built environment. The village is visible in its landscape setting from the by-pass. Intervening fields to the north of the by-pass form an important element of separation from modern housing estates located on the edge of Llantwit Major'

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3qj

6417 Object

Document Element: Land at Bridge House Farm,

Respondent: Mrs Julie Garvey [3578]

Summary:

The proposal of a supermarket would be detrimental to a village and the infrastructure could not cope with increased traffic and heavy goods vehicles delivering to the supermarket.

Full text:

The proposal of a supermarket would be detrimental to a village and the infrastructure could not cope with increased traffic and heavy goods vehicles delivering to the supermarket.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3nj

6497 Object

Document Element: Land at Church Farm, St

Respondent: Mr Neil Jenkins [2729]

Summary:

A1 Retail Unit and Risk of Change of Use
The inclusion of an A1 retail unit within the Church Farm plans is presented as a community benefit, yet there is no guarantee that this unit will ever operate as a shop. Developers routinely apply for change-of-use permissions after approval, and there is a legitimate concern that this “retail unit” could later be converted into additional housing. This would reduce promised community facilities while increasing housing density beyond what has been publicly consulted on. The RLDP provides no safeguards to prevent this outcome.

Full text:

Concerns Regarding the Church Farm Development
The proposals for Church Farm raise several serious concerns that further demonstrate the unsoundness of the RLDP.

A1 Retail Unit and Risk of Change of Use
The inclusion of an A1 retail unit within the Church Farm plans is presented as a community benefit, yet there is no guarantee that this unit will ever operate as a shop. Developers routinely apply for change-of-use permissions after approval, and there is a legitimate concern that this “retail unit” could later be converted into additional housing. This would reduce promised community facilities while increasing housing density beyond what has been publicly consulted on. The RLDP provides no safeguards to prevent this outcome.
Unsafe and Inappropriate Access Point
The proposed entrance to the Church Farm development is extremely concerning. It is located on a narrow section of road, in close proximity to a school, and adjacent to an existing shop that already generates local traffic and pedestrian activity. Crucially, this road is the only route into the village from the east. Introducing hundreds of additional vehicle movements at peak times will create serious safety risks, particularly for children walking to and from school. The RLDP provides no evidence that this road can safely accommodate the increased traffic.
Traffic Chaos at Peak Times
Because this road is the sole eastern access into St Athan, the additional vehicles generated by the Church Farm development will cause significant bottlenecks. Morning and evening peak times will be particularly affected, with queues forming along a route that has no capacity for widening or alternative diversion. This is a clear example of development being proposed in a location where the road network is fundamentally unsuitable.

Inadequate Public Transport and Increased Car Dependency
The RLDP repeatedly claims to promote sustainable travel, yet the proposals for these villages directly contradict that aim. St Athan, Flemingston and Eglwys Brewys have no railway station, limited and unreliable bus services, and no realistic active-travel links. Without credible, funded improvements, new development will force residents to rely almost entirely on private cars, increasing congestion, pollution, and carbon emissions. This directly undermines the Council’s own climate-change and sustainability commitments.

Absence of Local Employment Opportunities
The RLDP proposes significant housing growth without any realistic strategy for local employment. Previous employment sites have either reduce, closed or been repurposed, leaving limited job opportunities especially in the more rural areas where the majority of the housing development seems to be proposed. Most residents must commute to Barry, Cardiff, Bridgend or further afield, and new development will only increase outward commuting. This contradicts the RLDP’s stated objective of creating balanced, self-sustaining communities.

Increased Surface Water Flooding from Loss of Farmland
The conversion of agricultural land into housing poses a serious flood-risk concern. Farmland currently provides natural drainage and water absorption. Replacing it with hard surfaces will increase surface water run-off, heighten flood risk for existing homes and roads, and place additional pressure on drainage systems already known to be fragile. The RLDP does not provide robust, site-specific drainage strategies or long-term maintenance plans to address these risks.

No Provision for Upgraded Infrastructure or Essential Services
One of the most serious shortcomings of the RLDP is the complete absence of any provision for upgraded essential infrastructure to support the proposed population growth. The plan does not include additional GP or dental capacity, increased fire, police or emergency service provision, meaningful road network improvements, or investment in community facilities. This omission makes the RLDP fundamentally unsound, as it fails to provide the basic services required for safe, healthy, functioning communities.

Potential for Increased Anti-Social Behaviour and Pressure on Policing
The RLDP also fails to consider the social impacts of large-scale development in rural villages. Rapid population growth without corresponding investment in community facilities, youth services, open spaces, and policing capacity increases the risk of anti-social behaviour. St Athan, Flemingston and Eglwys Brewys are currently served by a police force that is already stretched, with limited local presence. Additional housing without increased policing resources will place further pressure on officers, reduce the ability to respond promptly to incidents, and undermine community safety and cohesion.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation - redacted - https://valeofglamorgan.oc2.uk/a/3h3

6584 Object

Document Element: SP12 - RETAIL FLOORSPACE PROVISION

Respondent: Councillor Stephen Haines [1029]

Summary:

The Deposit RLDP does not allocate new retail units or local service provision within the ward of Flemingston.
Given the scale of proposed housing growth across St. Athan and its surrounding areas, there is:
- No corresponding neighbourhood retail allocation.
- No clear commitment to small-scale convenience retail within walking distance of new development.
- No spatial recognition of Flemingston's service deficit.

This is inconsistent with Planning Policy Wales placemaking principles, which require:
- Mixed-use neighbourhoods.
- Walkable access to daily services.
- Reduced reliance on private vehicles.

Without provision of much-needed retail units within Flemingston ward, residents will remain dependent on car travel for everyday needs.
Modification is therefore sought to require neighbourhood retail and service provision proportionate to housing growth.

Full text:

1. Section of Plan to which this Representation Relates
- Sustainable Growth Strategy
- Key Housing Sites:
KS4 - Land at Church Farm, St. Athan (532 dwellings) KS5 - Land to the West of St. Athan (600 dwellings)
- Housing Allocations: HG1(7)
Former Stadium Site, adjacent to Burley Place (80 dwellings)
HG1(8) - Clive Road, St. Athan (51 dwellings)
- Transport Policy (TR)
- Community Infrastructure Policy (CI)
- Policy SP13 - Infrastructure Provision
- Green Infrastructure Policies

2. Summary of Representation
This representation raises concerns regarding:
1. The scale of housing growth in St. Athan.
2. The absence of guaranteed sustainable transport infrastructure.
3. Insufficient retail and community infrastructure provision, particularly within the ward of Flemingston.
4. The allocation of the Clive Road site (HG1(8)), which currently functions as a de facto village green.
5. The cumulative infrastructure impact of candidate and legacy site allocations.
The representation seeks modifications to ensure the Plan is infrastructure-led, deliverable, and compliant with national planning policy and the Well-being of Future Generations (Wales) Act 2015.

3. Scale of Housing Growth in St. Athan
The RLDP allocates:
- KS4 - 532 dwellings
- KS5 - 600 dwellings
- HG1(7) - 80 dwellings
- HG1(8) - 51 dwellings
This equates to 1,263 dwellings in St. Athan.
This represents a very significant expansion of the settlement and must be assessed against:
- Existing infrastructure capacity
- Transport provision
- Education and healthcare availability
- Retail and service provision
At present, St. Athan does not have a rail station and relies heavily on private car travel.
The Plan must demonstrate clearly that this level of growth is proportionate and deliverable.

4. Transport Infrastructure and Deliverability
The RLDP safeguards land for a "transport interchange" at St. Athan. However:
- There is no confirmed rail station.
- There is no confirmed funding package.
- There is no defined delivery programme.
- There are no binding occupation triggers linking housing delivery to transport delivery.

Previous references in planning documents referred to a railway station. The revised terminology of "transport interchange" reflects uncertainty.

Under Future Wales - The National Plan 2040, growth within the South East National Growth Area should align with sustainable transport infrastructure. Without guaranteed rail provision, development risks being car-dependent and inconsistent with decarbonisation objectives.

This raises concerns under the soundness test: Will the plan deliver?

5. Retail and Local Service Provision - Flemingston Ward

The Deposit RLDP does not allocate new retail units or local service provision within the ward of Flemingston.
Given the scale of proposed housing growth across St. Athan and its surrounding areas, there is:

- No corresponding neighbourhood retail allocation.
- No clear commitment to small-scale convenience retail within walking distance of new development.
- No spatial recognition of Flemingston's service deficit.

This is inconsistent with Planning Policy Wales placemaking principles, which require:

- Mixed-use neighbourhoods.
- Walkable access to daily services.
- Reduced reliance on private vehicles.

Without provision of much-needed retail units within Flemingston ward, residents will remain dependent on car travel for everyday needs.
Modification is therefore sought to require neighbourhood retail and service provision proportionate to housing growth.

6. Clive Road Site (HG1(8)) - Community Function

The Clive Road site (HG1(8), 51 dwellings) currently functions as a de facto village green.
Although not formally designated, it is:
- Used informally for recreation.
- A visual open space within the settlement.
- A valued community amenity.
Its allocation for housing would result in:
- Loss of accessible informal open space.
- Erosion of community character.
- Reduction in green infrastructure connectivity.
The Plan should:
- Reassess the allocation in light of its community use; or
- Require equivalent or superior replacement open space within immediate proximity prior to development.
This matter engages Policy on Open Space and Green Infrastructure and must be considered in accordance with the prevention and long-term principles of the Well- being Act.

7. Candidate and Legacy Sites - Cumulative Impact Several allocations in St. Athan arise from:
- The Candidate Site process.
- Rolled-forward legacy allocations.
Individually, smaller sites may appear acceptable. However, cumulatively they produce substantial growth in a settlement with constrained infrastructure.
The Plan must demonstrate:
- Why these sites were preferred over alternatives.
- That lower growth options were robustly assessed.
- That greenfield loss is justified and mitigated.

8. Infrastructure and Phasing Concerns
Policy SP13 refers to securing infrastructure through planning obligations. However, reliance on financial contributions alone does not ensure timely delivery.

There is insufficient clarity regarding:
- Education capacity expansion.
- Primary healthcare provision.
- Highway mitigation triggers.
- Public transport enhancement sequencing.

Infrastructure must be delivered ahead of, or in tandem with, housing occupation - not retrospectively.

9. Compliance with the Five Ways of Working

Long-Term: Irreversible greenfield expansion without secured sustainable transport risks embedding long-term car

dependency.
Prevention: Without infrastructure-first sequencing, congestion and service strain are foreseeable.
Integration: Housing growth appears to run ahead of confirmed transport and retail provision.
Collaboration: The Plan should demonstrate binding commitments from transport and infrastructure partners.
Involvement: Community concerns regarding scale and open space loss must be properly addressed.

10. Modifications Sought

To ensure soundness and compliance with national policy, the following modifications are requested:

1. Phasing Policy for KS4 and KS5
Introduce clear occupation thresholds tied to delivery of:
- Transport interchange infrastructure.
- Highway mitigation.Education capacity.
- Healthcare provision.

2. Retail Provision Requirement
Require neighbourhood retail and service provision within the ward of Flemingston proportionate to allocated and previous housing growth.

3. Clive Road Site Review (HG1(8))
Either:
- Remove the allocation; or
- Require replacement open space of equal or greater quality delivered prior to development.

4. Strengthened Infrastructure-First Wording
Amend Policy SP13 to make infrastructure delivery a pre-condition, not solely a contribution mechanism.

5. Monitoring Framework Enhancement Include specific indicators for:
- Sustainable transport modal share.
- Retail provision delivery.
- Open space replacement.
- Infrastructure phasing compliance.

11. Conclusion

St. Athan has a role within the wider Cardiff Capital Region and the South East National Growth Area. However, the current scale of housing allocation is not sufficiently matched by guaranteed infrastructure, retail provision, or community space protection.

Without modification, the Plan risks:
- Car-dependent growth,
- Loss of valued open space,
- Insufficient local retail provision,
- Pressure on community infrastructure.
This representation therefore seeks amendments to ensure that growth in St. Athan and Flemingston is proportionate, infrastructure-led, environmentally responsible, and compliant with Welsh planning policy.

Change suggested by respondent:

Require neighbourhood retail and service provision within the ward of Flemingston proportionate to allocated and previous housing growth.

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3tk

6638 Object

Document Element: Land at Bridge House Farm,

Respondent: Mr Richard Cobourne [3440]

Summary:

My main concern is for the survival of the town of Llantwit Major and its small owner-managed shops, Post Office, chemists, charity shops, hairdressers, etc. And to some extent existing supermarkets. I am also concerned about maintaining green spaces and conservation areas as per the adopted Management Plan.
Building an 'out of town' supermarket will significantly and detrimentally affect footfall to the town centre — people who use the current town centre retail and hospitality opportunities simply will not visit as they will be parked away from them and will not return. The town will slowly die. Shops and other premises will be boarded up. Livelihoods will be lost. Time-and-again we have seen many towns across Wales and the rest of the UK suffer. Simple desk-based research will reveal many.
Taking one town as an example — Chepstow. Tesco built a supermarket about 150 metres from Chepstow high street across a main road — not dissimilar to the situation in Llantwit Major / Llanmaes. Few now visit Chepstow high street so the town itself is dying. Shops and other premises have closed, remaining empty for years — and at a time when retail outlets are increasingly under pressure from on-line shopping.
The council and planners must do everything it can to ensure that Llantwit Major remains a vibrant and varying environment for generations to come — providing employment and facilities for all to enjoy.
Building out-of-town will destroy the community of Llantwit Major for ever.

Full text:

I understand that the Draft Plan for the RLDP is now open for consultation. I would be grateful if my comments below would be included please.

Site ID 436 — Proposal Number DNP2(6)
Conservation / Green Wedge
I support the proposal for a green wedge conservation area protecting it from development.

Site ID 379 — Proposal Number SP12(2)
Retail — land at Bridge House Farm
My main concern is for the survival of the town of Llantwit Major and its small owner-managed shops, Post Office, chemists, charity shops, hairdressers, etc. And to some extent existing supermarkets. I am also concerned about maintaining green spaces and conservation areas as per the adopted Management Plan.
Building an 'out of town' supermarket will significantly and detrimentally affect footfall to the town centre — people who use the current town centre retail and hospitality opportunities simply will not visit as they will be parked away from them and will not return. The town will slowly die. Shops and other premises will be boarded up. Livelihoods will be lost. Time-and-again we have seen many towns across Wales and the rest of the UK suffer. Simple desk-based research will reveal many.
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The council and planners must do everything it can to ensure that Llantwit Major remains a vibrant and varying environment for generations to come — providing employment and facilities for all to enjoy.
Building out-of-town will destroy the community of Llantwit Major for ever.
Housing — land to the south of Millands Farm etc.

HG1(5), HG2(21) and HG2(3)
I am silent on this proposal

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/t9q

7001 Comment

Document Element: Land at Church Farm, St

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

This site is located within the boundary of HG1 KS4 Land at Church Farm.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037

Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
Our representations on the site allocations are included in appendix 2.
We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the ‘domestic’ supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge

consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.
Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site
Our representations on site allocations are provided in the table below. The following caveats are applicable to all sites:
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion.
• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
The following provisions are applicable to all allocated employment sites:
• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be

undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
• Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcements.
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

7002 Comment

Document Element: Land at Bridge House Farm,

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Dwr Cymru Welsh Water has made representations on planning application ref 2022/00907/FUL.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision

Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
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Our representations on the site allocations are included in appendix 2.
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EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
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We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
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• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to

accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

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The following provisions are applicable to all allocated employment sites:
• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
• Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcements.
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

7018 Object

Document Element: SP12 - RETAIL FLOORSPACE PROVISION
Respondent: Lidl GB Limited [1459]
Agent: CarneySweeney

Summary:

SP12 – RETAIL FLOORSPACE PROVISION

Lidl Great Britain Ltd firmly supports the allocation within draft Policy SP12 (Retail Floorspace Provision) for 1,251sqm of convenience floorspace at Land at Bridge House Farm, Llanmaes, Llantwit Major. This allocation is needed to ensure the plan is sound, by addressing unmet need at Llantwit Major which is a Service Centre and focus for growth. This should be made clear in the reasoned justification.

In respect to Penarth, Policy SP12, together with supporting paragraphs 6.208–6.210, do not, however, adequately reflect the findings of the Council's Retail & Leisure Study (BP13). Policy SP12 should also plan positively for the identified convenience retail needs within Zone 5 (Penarth/ Llandough). BP13 confirms that Penarth District Centre is not served by a medium to larger supermarket (para. 9.2). The BP13 Study finds quantitative and qualitative capacity for a medium to larger supermarket by 2036 in Penarth (paras. 9.23, 12.24).

It finds overall quantitative convenience capacity of up to c.5,862sqm net floorspace (assuming deep discounter operators). In qualitative terms the following Centres have been identified in potential need for a medium to larger supermarket: Barry Holton Road town centre; Penarth district centre and Llantwit Major district centre. Quantitative and qualitative need is identified.

Despite the evidence of unmet need, the Deposit LDP Policy SP12 allocates only two sites for convenience retail totalling c. 3,109sqm net; one site at Llanwit Major and a second site at St Athan. This is below the overall (up to 4,282–5,862sqm net) requirement identified in BP13. The allocation of land at Llantwit Major aligns with the evidence base, has been thoroughly tested at application stage and this is fully supported.

Policy SP12 is silent on the need for additional floorspace at Penarth/Llandough (Zone 5) and as such does not reflect the evidence base findings and address identified need in Penarth, with a 'residual' quantitative capacity of c.1,173–2,753sqm net unmet/unallocated. We note Policy SP12 states that any additional convenience and comparison retail floorspace beyond that provided by the identified sites should be directed towards the town and district centres outlined in Policy SP11. However, this merely reflects national guidance in respect to directing growth to town/district centres (i.e. applying a sequential approach). The Policy should go further and seek to allocate the residual unmet need to Penarth/ Llandough. We note the BP13 is silent on additional need at St Athan.

Planning Policy Wales (PPW) 12 requires LPAs to identify the appropriate form, scale and location to meet retail needs (para. 4.3.8) and emphasises ensuring communities have access to adequate retail provision (para. 4.3.13). PPW therefore places a duty on LPAs to plan positively for evidenced retail needs. In respect to Penarth/Llandough Policy SP12 should seek to address this requirement.

Under PPW and TAN4, LPAs must apply the sequential test, directing new retail development to locations that are:

• In-centre,

• Edge-of-centre, and only then,

• Out-of-centre locations that are accessible and well-connected to the catchment.

Penarth Centre is physically constrained. In the absence of any in-centre or edge-of-centre sites capable of accommodating a medium/larger supermarket, the next sequentially preferable option is the most accessible, well-connected site within the same catchment, capable of meeting identified need and reducing expenditure leakage.

Full text:

Draft RCS2 sets out three criteria for new A1, A2 or A3 uses on new sites or existing retail areas which are as follows:

1. "It can be demonstrated that there is an additional need for the proposal which cannot be provided within an existing retail, commercial and service centre; and

2. The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.

3. The proposal would serve local needs in a neighbourhood or rural village."

We consider the policy should read as follows:

"1 It can be demonstrated that there is an additional need for the proposal which, when applying the sequential approach to locating development as outlined in national guidance, it has been demonstrated that the site is sequentially preferable; and

2 The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.

3 Proposals serving only local needs should be of a scale and type which does not undermine the vibrancy, attractiveness and viability of neighbourhood centres."

The settlement boundary, defined by Policy SP2, excludes allocation site SP12 'Land at Bridge House Farm, Llanmaes, Llantwit Major' which is for a retail foodstore. Instead, the draft allocation abuts, but lies outside, the settlement boundary as currently drawn. Although draft Policy SP3 states that "Areas outside settlement boundaries that are not allocated or protected for a specific use will be defined as countryside we consider the settlement boundary must be extended at this location to include the allocation. Its exclusion is illogical and would fail to reflect the 'on the ground' position when this allocation is delivered. Moreover, its exclusion could confuse and may constrain any future minor development changes at the site (e.g. those needed to meet operational needs the subject of any planning application).

The draft proposals map shows the allocation as a dot which does not cover the full extent of the allocation. See below:

See plan in attachment

By not including the extent of the site/allocation within the defined settlement boundary, the draft plan fails to recognise the allocation will form an important part of the settlement, the delivery of which is crucial to meeting identified needs. Accordingly, we believe this fails Test 2 (Is the plan appropriate?), and it may fail Test 3 (Will the plan deliver) as its exclusion from the boundary may unduly impact the future site operation.

Lidl Great Britain Ltd objects to draft policy SP11 (Retail, commercial and service centre hierarchy) as worded as it fails

to meet Test 2 (Is the plan appropriate?). Draft Policy SP11 sets out the proposed retail hierarchy (See extract below), but it does not accord with the settlement hierarchy as set out in draft Policy SP2 and it is not justified.
The adopted LDP Settlement Hierarchy lists:
Key Settlement: Barry
Service Centre Settlements: Cowbridge, Llantwit Major and Penarth
The adopted LDP Retail hierarchy lists:
Town centres: Barry
District centres: Barry (high street/broad street), Cowbridge, Llantwit Major, Penarth
Draft SP2 of the Deposit Plan identifies Cowbridge, Llantwit Major and Penarth as Service Centre Settlements in the Settlement Hierarchy.
However, draft SP11 lists a retail hierarchy as follows:
Town Centres – Barry (Holton Rd), Penarth, Cowbridge
District Centres – Barry (High Street), Llantwit Major
It is unexplained and unjustified that the SP11 retail hierarchy upgrades Cowbridge to Town Centre status, while Llantwit Major and Barry High Street remain District Centres.
The Deposit Plan includes two retail allocations, neither are intended to directly serve Penarth or Cowbridge. Cowbridge is not a focus for growth. It is therefore unjustified that Llantwit Major, which is served by a train station, is a settlement roughly twice the size of Cowbridge (by population) and is a manifestly more sustainable location and more appropriate focus for growth, is proposed to rank below Cowbridge in the retail hierarchy. Barry, Penarth and Llantwit Major should rank as Town Centres as the most sustainable locations for growth.
Penarth is an accessible settlement and an appropriate focus for growth. Indeed, the Council's BP13 (Retail and Commercial Leisure Study (June 2023)) recommends a medium to large supermarket to serve Penarth (Zone 5) but the Deposit Plan is absent of any food retail allocation for Penarth/Llandough. In addition to Llantwit Major and St Athan (Deposit Policy SP12) Penarth should be a focus for additional convenience provision over the plan period.

SP12 – RETAIL FLOORSPACE PROVISION
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In respect to Penarth, Policy SP12, together with supporting paragraphs 6.208–6.210, do not, however, adequately reflect the findings of the Council's Retail & Leisure Study (BP13). Policy SP12 should also plan positively for the identified convenience retail needs within Zone 5 (Penarth/ Llandough). BP13 confirms that Penarth District Centre is not served by a medium to larger supermarket (para. 9.2). The BP13 Study finds quantitative and qualitative capacity for a medium to larger supermarket by 2036 in Penarth (paras. 9.23, 12.24).
It finds overall quantitative convenience capacity of up to c.5,862sqm net floorspace (assuming deep discounter operators). In qualitative terms the following Centres have been identified in potential need for a medium to larger supermarket: Barry Holton Road town centre; Penarth district centre and Llantwit Major district centre. Quantitative and qualitative need is identified.
Despite the evidence of unmet need, the Deposit LDP Policy SP12 allocates only two sites for convenience retail totalling c. 3,109sqm net; one site at Llanwit Major and a second site at St Athan. This is below the overall (up to 4,282–5,862sqm net) requirement identified in BP13. The allocation of land at Llantwit Major aligns with the evidence base, has been thoroughly tested at application stage and this is fully supported.
Policy SP12 is silent on the need for additional floorspace at Penarth/Llandough (Zone 5) and as such does not reflect the evidence base findings and address identified need in Penarth, with a 'residual' quantitative capacity of c.1,173–2,753sqm net unmet/unallocated. We note Policy SP12 states that any additional convenience and comparison retail floorspace beyond that provided by the identified sites should be directed towards the town and district centres outlined in Policy SP11. However, this merely reflects national guidance in respect to directing growth to town/district centres (i.e. applying a sequential approach). The Policy should go further and seek to allocate the residual unmet need to Penarth/ Llandough. We note the BP13 is silent on additional need at St Athan.
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Under PPW and TAN4, LPAs must apply the sequential test, directing new retail development to locations that are:
• In-centre,
• Edge-of-centre, and only then,
• Out-of-centre locations that are accessible and well-connected to the catchment.
Penarth Centre is physically constrained. In the absence of any in-centre or edge-of-centre sites capable of accommodating a medium/larger supermarket, the next sequentially preferable option is the most accessible, well-connected site within the same catchment, capable of meeting identified need and reducing expenditure leakage.
Policy SP12 should plan positively for needs in Zone 5 (Penarth/Llandough) and include provision for a medium to large convenience foodstore in Zone 5 in accordance with BP13.
Enclosed with this representation is a separate representation (Under 8. New site submission) promoting a site for food retail development to meet identified needs within the Zone 5 Penarth/Llandough catchment. The site is considered accessible and sequentially preferable to meeting identified needs in Penarth.
The policy should be clear that identified need should be delivered in accordance with the sequential approach as set out in national guidance. As set out in Policy SP12 any additional convenience and comparison retail floorspace beyond that

provided by identified sites should be directed towards the town and district centres in accordance with the sequential approach. We support that the inclusion of retail floorspace as part of a mix of uses on allocated sites will also be supported.

POLICY DNP2 – GREEN WEDGES
Lidl objects to the inclusion of land at Penlan Road, Llandough (see Site Location Plan, drawing no. 3744 F420) within the Green Wedge designation under Policy DNP2. The site forms a distinct and enclosed parcel of land on the north-eastern edge of the designated Green Wedge, and its physical characteristics demonstrate that it does not serve the strategic purposes of the wider designation.
The northern and western boundaries are formed by Llandough Hospital, including the hospital access road and surface car parking, which clearly separate the site from the wider Green Wedge. The southern boundary is defined by residential properties along Corbett Road and the Merrier Harrier public house. The south-western and western boundaries are formed by further residential properties within Llandough. As such, built development extends beyond the site in multiple directions, meaning it does not contribute to the open land between settlements that Green Wedges are intended to protect.
The site is physically and visually contained with strong, defensible boundaries. Its close association with existing built form means that it does not exhibit the level of openness required for Green Wedge designation under PPW or BP27. BP27 requires Green Wedge boundaries to include only land that must remain open in the long term. When assessed against the four-stage SE Wales Green Wedge methodology, the site performs weakly. In terms of openness (Stage A), the site has low perceived openness as it is enclosed by development. Under development pressure (Stage B), the influence of surrounding built form means the site is already urban in character. In relation to Green Wedge purposes (Stage C), the site does not materially contribute to preventing coalescence, safeguarding open countryside, or protecting the setting of an urban area. The conclusion (Stage D) is therefore that the site's inclusion within the Green Wedge is anomalous.
Recent decisions in the emerging RLDP, such as the allocation of HG1 KS2, demonstrate that selective Green Wedge boundary amendments are acceptable where supported by evidence. Not all areas within the current designation are equally sensitive, and the site represents one of the least sensitive parts.
The Council's own evidence further supports the suitability of the land for development. The site does not lie within the Special Landscape Area that covers much of the remaining Green Wedge, highlighting its lower landscape sensitivity. The Candidate Site Assessment (BP18a examined the wider parcel (Site ID 400) for housing and concluded that it would form a natural extension to the Llandough settlement boundary. It noted that the land would represent an incursion only if less sensitive sites could not be delivered and discounted the site solely because housing need had been met elsewhere, not due to landscape or Green Wedge harm. This confirms the Council recognises the land is capable of development. The same land can therefore appropriately meet other evidenced needs, including retail provision.
In separate representations, Lidl is promoting land to the south of Llandough Hospital via 'RDLP New site submissions'. It is considered that the site can be developed in a low-impact, landscape-led and sensitively designed manner that respects its transitional position between the urban edge and the wider Green Wedge. A modest single storey medium sized foodstore delivers a built form that can sit comfortably below surrounding tree lines and hospital structures. A comprehensive landscape strategy, including reinforced boundary planting, native woodland edge enhancement, and carefully designed building can soften building edges, strengthen the site's defensible boundaries, and integrate the scheme with its surroundings. The development would therefore appear as an infill of the existing urban area, rather than any intrusion into the open countryside, and can be designed to maintain the wider Green Wedge's openness and character by delivering a strong defensible physical boundary which prevents any further development beyond the site.
As set out in separate representations the Council's Retail and Leisure Study (BP13) identifies a clear quantitative and qualitative need for a medium to larger supermarket within Zone 5, alongside notable levels of convenience expenditure leakage to Zone 3 (Cardiff). The promoted site is well positioned to intercept this leakage, meet the identified convenience floorspace requirement, and provide improved local convenience retail provision for Llandough/Penarth. There is, therefore, a clear needs-based justification for release of this parcel of land from the Green Wedge designation.
The Green Wedge boundary should be amended at this location to remove the promoted site from Policy DNP2 (Green Wedge designation) and from the Proposals Map. In parallel, the settlement boundary defined by Policy SP2 should be realigned to include the promoted site, reflecting the site's physical relationship with existing development, its defensible boundaries, and its suitability to meet an evidenced strategic retail need.

The Policy text should be changed as follows:
"Proposals involving the change of use at ground floor level uses from A1 retail use within Service Centres will permitted where the proposal would:…"
The Policy RCS1 (Resilient retail, commercial and service centres) supporting text adds new policy requirements which are not within the draft policy. Paragraph 6.214 states that:
"Changes of use class in Retail, Commercial and Service Centres must be justified by evidence that the property has been affected by a sustained period of long-term vacancy and that proactive marketing has been undertaken by a property agent for a minimum of 12 months in an effort to secure tenants. The marketing report should include:
• Details of the existing use or previous use if vacant;
• The length of time the unit has been vacant, if applicable;
• The type of use which the unit has been marketed for, what the marketing strategy involved and its duration;
• The amount of interest in the unit during the marketing period – this should detail the number of queries, the type of

uses sought, and if known, the reason for not pursuing any initial enquiries."
However, nowhere in the draft policy wording does it explicitly state to include 12 months of marketing activity. The draft supporting text reads as though this is a policy requirement, rather than supportive guidance. This is contrary to caselaw which confirms that supporting text cannot be used to expand the policy beyond its wording (R (Cherkley Campaign Ltd) v Mole Valley District Council). A proposal could meet the requirements of the criteria sets out in draft policy RCS1 without being marketed for a minimum of 12 months. If the Plan is adopted as currently set out, there is a risk of internal inconsistency between policy RSC1 and the supporting text. Accordingly, this would fail Test 2 (Is the plan appropriate?) as it is not coherent or consistent.
We also have concerns with criterion 5 which states to "Avoid an over-concentration of non-retail uses that would undermine the retail function of the centre". This is because 'over-concentration' has not been defined within the draft policy. This contrasts with draft policy RCS3 which includes a definition of what an over-concentration of hot food takeaways would be. Without a definition of what an over-concentration of non-retail uses is, the draft policy will remain and lack clarity. Additionally, without a definition, the draft policy may fail Tests 2 and 3 as it is currently unclear (Test 2: Is the plan appropriate?) and cannot be effective (Test 3: Will the plan deliver?).

At present, we consider the Deposit Plan inadequately supports the Welsh language. Although the Welsh Language is included within Objective 6 (Embracing Culture and Heritage), the Deposit Plan does not contain a policy which seeks to promote the Welsh language, nor is the promotion of the Welsh language referenced in other Deposit Plan policies where this may be appropriate. Without a clear policy, applicants do not need to explicitly consider impact on the Welsh language so the role of the RLDP will be limited.
Local Development Plans should accord with national policy and guidance. For instance, the supporting text to Policy 1 of Future Wales states that "Key issues, including … the Welsh language, are core elements of policy 1 and are common threads underpinning all Future Wales policies." However, we believe that the Welsh language is not currently underpinning the policies within the Deposit Plan.
Additionally, paragraph 3.25 of PPW states that "The Welsh language is part of the social and cultural fabric and its future well being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. The land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its, use and the Thriving Welsh Language well being goal." Paragraph 3.29 goes on to suggest language impact assessments are required for "large developments not allocated in a development plan which are proposed in areas of particular sensitivity or importance for the language" with these areas defined in the LDP. In this instance, PPW sets out guidance for developers which is not present in the Deposit Plan.
The Vale of Glamorgan Council commissioned AECOM to produce the Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan (November 2025). Paragraph 9.5.9 recommends including a specific policy that supports and protects the Welsh language within the Deposit Plan. This contrasts with the Welsh Language (November 2025) Background paper, produced by the VoGC, which concludes that a specific Welsh Language policy is not warranted, albeit it does acknowledge the Plan's statutory duty to consider the Welsh language and embed relevant provisions within broader thematic policies. However, this is currently lacking as the Deposit Plan does not reference the Welsh language within other policies. Although the Background Paper considers that the RLDP is "unlikely to adversely affect the existing patterns of Welsh language use within the Vale of Glamorgan", the Plan should seek to promote the Welsh language.
Developers should be encouraged to promote the Welsh language where this may be reasonable and appropriate e.g. bilingual signage and announcements. Lidl actively promotes the Welsh language through their business. The Deposit Plan should be amended to strengthen the importance of the Welsh language, helping to meet Objective 6 over the RLDP period. Overall, without clear Welsh Language policy promotion, the Deposit Plan cannot positively impact the Welsh language. The Deposit Plan needs to go further.

Change suggested by respondent:

Policy SP12 should plan positively for needs in Zone 5 (Penarth/Llandough) and include provision for a medium to large convenience foodstore in Zone 5 in accordance with BP13.
Enclosed with this representation is a separate representation (Under 8. New site submission) promoting a site for food retail development to meet identified needs within the Zone 5 Penarth/Llandough catchment. The site is considered accessible and sequentially preferable to meeting identified needs in Penarth.
The policy should be clear that identified need should be delivered in accordance with the sequential approach as set out in national guidance. As set out in Policy SP12 any additional convenience and comparison retail floorspace beyond that provided by identified sites should be directed towards the town and district centres in accordance with the sequential approach. We support that the inclusion of retail floorspace as part of a mix of uses on allocated sites will also be supported.

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rm
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rn
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4ry
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Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rq
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4sr

7108 Support

Document Element: Land at Church Farm, St
Respondent: Barratt Redrow Homes [2669]
Agent: Turley

Summary:
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Full text:
Policy SP1 - Sustainable Growth Strategy
Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.
It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.
In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"
Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be concentrated is supported.

Policy SP2 - Settlement Hierarchy
The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable. As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Policy SP4 - Placemaking
We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.
The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses... ' or to be developed at 'high densities... and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.
Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have

already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Policy PGDl - Creating Well Designed and Inclusive Places
There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic

highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy Cll - Open Space Provision
The wording of Policy Cll, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy Cll should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy Cll requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at

Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7206 Support

Document Element: Land at Bridge House Farm,
Respondent: Lidl GB Limited [1459]
Agent: CarneySweeney

Summary:

Lidl Great Britain Ltd firmly supports the allocation within draft Policy SP12 (Retail Floorspace Provision) for 1,251sqm of convenience floorspace at Land at Bridge House Farm, Llanmaes, Llantwit Major. This allocation is needed to ensure the plan is sound, by addressing unmet need at Llantwit Major which is a Service Centre and focus for growth. This should be made clear in the reasoned justification.

Full text:

Draft RCS2 sets out three criteria for new A1, A2 or A3 uses on new sites or existing retail areas which are as follows:
1. “It can be demonstrated that there is an additional need for the proposal which cannot be provided within an existing retail, commercial and service centre; and
2. The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.
3. The proposal would serve local needs in a neighbourhood or rural village.”
We consider the policy should read as follows:
“1 It can be demonstrated that there is an additional need for the proposal which, when applying the sequential approach to locating development as outlined in national guidance, it has been demonstrated that the site is sequentially preferable; and
2 The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.
3 Proposals serving only local needs should be of a scale and type which does not undermine the vibrancy, attractiveness and viability of neighbourhood centres.”

The settlement boundary, defined by Policy SP2, excludes allocation site SP12 ‘Land at Bridge House Farm, Llanmaes, Llantwit Major’ which is for a retail foodstore. Instead, the draft allocation abuts, but lies outside, the settlement boundary as currently drawn. Although draft Policy SP3 states that “Areas outside settlement boundaries that are not allocated or protected for a specific use will be defined as countryside we consider the settlement boundary must be extended at this location to include the allocation. Its exclusion is illogical and would fail to reflect the ‘on the ground’

position when this allocation is delivered. Moreover, its exclusion could confuse and may constrain any future minor development changes at the site (e.g. those needed to meet operational needs the subject of any planning application).
The draft proposals map shows the allocation as a dot which does not cover the full extent of the allocation. See below:
See plan in attachment
By not including the extent of the site/allocation within the defined settlement boundary, the draft plan fails to recognise the allocation will form an important part of the settlement, the delivery of which is crucial to meeting identified needs. Accordingly, we believe this fails Test 2 (Is the plan appropriate?), and it may fail Test 3 (Will the plan deliver) as its exclusion from the boundary may unduly impact the future site operation.

Lidl Great Britain Ltd objects to draft policy SP11 (Retail, commercial and service centre hierarchy) as worded as it fails to meet Test 2 (Is the plan appropriate?). Draft Policy SP11 sets out the proposed retail hierarchy (See extract below), but it does not accord with the settlement hierarchy as set out in draft Policy SP2 and it is not justified.
The adopted LDP Settlement Hierarchy lists:
Key Settlement: Barry
Service Centre Settlements: Cowbridge, Llantwit Major and Penarth
The adopted LDP Retail hierarchy lists:
Town centres: Barry
District centres: Barry (high street/broad street), Cowbridge, Llantwit Major, Penarth
Draft SP2 of the Deposit Plan identifies Cowbridge, Llantwit Major and Penarth as Service Centre Settlements in the Settlement Hierarchy.
However, draft SP11 lists a retail hierarchy as follows:
Town Centres – Barry (Holton Rd), Penarth, Cowbridge
District Centres – Barry (High Street), Llantwit Major
It is unexplained and unjustified that the SP11 retail hierarchy upgrades Cowbridge to Town Centre status, while Llantwit Major and Barry High Street remain District Centres.
The Deposit Plan includes two retail allocations, neither are intended to directly serve Penarth or Cowbridge. Cowbridge is not a focus for growth. It is therefore unjustified that Llantwit Major, which is served by a train station, is a settlement roughly twice the size of Cowbridge (by population) and is a manifestly more sustainable location and more appropriate focus for growth, is proposed to rank below Cowbridge in the retail hierarchy. Barry, Penarth and Llantwit Major should rank as Town Centres as the most sustainable locations for growth.
Penarth is an accessible settlement and an appropriate focus for growth. Indeed, the Council's BP13 (Retail and Commercial Leisure Study (June 2023)) recommends a medium to large supermarket to serve Penarth (Zone 5) but the Deposit Plan is absent of any food retail allocation for Penarth/Llandough. In addition to Llantwit Major and St Athan (Deposit Policy SP12) Penarth should be a focus for additional convenience provision over the plan period.

SP12 – RETAIL FLOORSPACE PROVISION
Lidl Great Britain Ltd firmly supports the allocation within draft Policy SP12 (Retail Floorspace Provision) for 1,251sqm of convenience floorspace at Land at Bridge House Farm, Llanmaes, Llantwit Major. This allocation is needed to ensure the plan is sound, by addressing unmet need at Llantwit Major which is a Service Centre and focus for growth. This should be made clear in the reasoned justification.
In respect to Penarth, Policy SP12, together with supporting paragraphs 6.208–6.210, do not, however, adequately reflect the findings of the Council's Retail & Leisure Study (BP13). Policy SP12 should also plan positively for the identified convenience retail needs within Zone 5 (Penarth/ Llandough). BP13 confirms that Penarth District Centre is not served by a medium to larger supermarket (para. 9.2). The BP13 Study finds quantitative and qualitative capacity for a medium to larger supermarket by 2036 in Penarth (paras. 9.23, 12.24).
It finds overall quantitative convenience capacity of up to c.5,862sqm net floorspace (assuming deep discounter operators). In qualitative terms the following Centres have been identified in potential need for a medium to larger supermarket: Barry Holton Road town centre; Penarth district centre and Llantwit Major district centre. Quantitative and qualitative need is identified.
Despite the evidence of unmet need, the Deposit LDP Policy SP12 allocates only two sites for convenience retail totalling c. 3,109sqm net; one site at Llanwit Major and a second site at St Athan. This is below the overall (up to 4,282–5,862sqm net) requirement identified in BP13. The allocation of land at Llantwit Major aligns with the evidence base, has been thoroughly tested at application stage and this is fully supported.
Policy SP12 is silent on the need for additional floorspace at Penarth/Llandough (Zone 5) and as such does not reflect the evidence base findings and address identified need in Penarth, with a 'residual' quantitative capacity of c.1,173–2,753sqm net unmet/unallocated. We note Policy SP12 states that any additional convenience and comparison retail floorspace beyond that provided by the identified sites should be directed towards the town and district centres outlined in Policy SP11. However, this merely reflects national guidance in respect to directing growth to town/district centres (i.e. applying a sequential approach). The Policy should go further and seek to allocate the residual unmet need to Penarth/ Llandough. We note the BP13 is silent on additional need at St Athan.
Planning Policy Wales (PPW) 12 requires LPAs to identify the appropriate form, scale and location to meet retail needs (para. 4.3.8) and emphasises ensuring communities have access to adequate retail provision (para. 4.3.13). PPW therefore places a duty on LPAs to plan positively for evidenced retail needs. In respect to Penarth/Llandough Policy SP12 should seek to address this requirement.
Under PPW and TAN4, LPAs must apply the sequential test, directing new retail development to locations that are:
• In-centre,
• Edge-of-centre, and only then,
• Out-of-centre locations that are accessible and well-connected to the catchment.

Penarth Centre is physically constrained. In the absence of any in-centre or edge-of-centre sites capable of accommodating a medium/larger supermarket, the next sequentially preferable option is the most accessible, well-connected site within the same catchment, capable of meeting identified need and reducing expenditure leakage.
Policy SP12 should plan positively for needs in Zone 5 (Penarth/Llandough) and include provision for a medium to large convenience foodstore in Zone 5 in accordance with BP13.
Enclosed with this representation is a separate representation (Under 8. New site submission) promoting a site for food retail development to meet identified needs within the Zone 5 Penarth/Llandough catchment. The site is considered accessible and sequentially preferable to meeting identified needs in Penarth.
The policy should be clear that identified need should be delivered in accordance with the sequential approach as set out in national guidance. As set out in Policy SP12 any additional convenience and comparison retail floorspace beyond that provided by identified sites should be directed towards the town and district centres in accordance with the sequential approach. We support that the inclusion of retail floorspace as part of a mix of uses on allocated sites will also be supported.

POLICY DNP2 – GREEN WEDGES
Lidl objects to the inclusion of land at Penlan Road, Llandough (see Site Location Plan, drawing no. 3744 F420) within the Green Wedge designation under Policy DNP2. The site forms a distinct and enclosed parcel of land on the north-eastern edge of the designated Green Wedge, and its physical characteristics demonstrate that it does not serve the strategic purposes of the wider designation.
The northern and western boundaries are formed by Llandough Hospital, including the hospital access road and surface car parking, which clearly separate the site from the wider Green Wedge. The southern boundary is defined by residential properties along Corbett Road and the Merrier Harrier public house. The south-western and western boundaries are formed by further residential properties within Llandough. As such, built development extends beyond the site in multiple directions, meaning it does not contribute to the open land between settlements that Green Wedges are intended to protect.
The site is physically and visually contained with strong, defensible boundaries. Its close association with existing built form means that it does not exhibit the level of openness required for Green Wedge designation under PPW or BP27. BP27 requires Green Wedge boundaries to include only land that must remain open in the long term. When assessed against the four-stage SE Wales Green Wedge methodology, the site performs weakly. In terms of openness (Stage A), the site has low perceived openness as it is enclosed by development. Under development pressure (Stage B), the influence of surrounding built form means the site is already urban in character. In relation to Green Wedge purposes (Stage C), the site does not materially contribute to preventing coalescence, safeguarding open countryside, or protecting the setting of an urban area. The conclusion (Stage D) is therefore that the site's inclusion within the Green Wedge is anomalous.
Recent decisions in the emerging RLDP, such as the allocation of HG1 KS2, demonstrate that selective Green Wedge boundary amendments are acceptable where supported by evidence. Not all areas within the current designation are equally sensitive, and the site represents one of the least sensitive parts.
The Council's own evidence further supports the suitability of the land for development. The site does not lie within the Special Landscape Area that covers much of the remaining Green Wedge, highlighting its lower landscape sensitivity. The Candidate Site Assessment (BP18a examined the wider parcel (Site ID 400) for housing and concluded that it would form a natural extension to the Llandough settlement boundary. It noted that the land would represent an incursion only if less sensitive sites could not be delivered and discounted the site solely because housing need had been met elsewhere, not due to landscape or Green Wedge harm. This confirms the Council recognises the land is capable of development. The same land can therefore appropriately meet other evidenced needs, including retail provision.
In separate representations, Lidl is promoting land to the south of Llandough Hospital via 'RDLP New site submissions'. It is considered that the site can be developed in a low-impact, landscape-led and sensitively designed manner that respects its transitional position between the urban edge and the wider Green Wedge. A modest single storey medium sized foodstore delivers a built form that can sit comfortably below surrounding tree lines and hospital structures. A comprehensive landscape strategy, including reinforced boundary planting, native woodland edge enhancement, and carefully designed building can soften building edges, strengthen the site's defensible boundaries, and integrate the scheme with its surroundings. The development would therefore appear as an infill of the existing urban area, rather than any intrusion into the open countryside, and can be designed to maintain the wider Green Wedge's openness and character by delivering a strong defensible physical boundary which prevents any further development beyond the site.
As set out in separate representations the Council's Retail and Leisure Study (BP13) identifies a clear quantitative and qualitative need for a medium to larger supermarket within Zone 5, alongside notable levels of convenience expenditure leakage to Zone 3 (Cardiff). The promoted site is well positioned to intercept this leakage, meet the identified convenience floorspace requirement, and provide improved local convenience retail provision for Llandough/Penarth. There is, therefore, a clear needs-based justification for release of this parcel of land from the Green Wedge designation.
The Green Wedge boundary should be amended at this location to remove the promoted site from Policy DNP2 (Green Wedge designation) and from the Proposals Map. In parallel, the settlement boundary defined by Policy SP2 should be realigned to include the promoted site, reflecting the site's physical relationship with existing development, its defensible boundaries, and its suitability to meet an evidenced strategic retail need.

The Policy text should be changed as follows:
"Proposals involving the change of use at ground floor level uses from A1 retail use within Service Centres will permitted

where the proposal would:…"
The Policy RCS1 (Resilient retail, commercial and service centres) supporting text adds new policy requirements which are not within the draft policy. Paragraph 6.214 states that:
"Changes of use class in Retail, Commercial and Service Centres must be justified by evidence that the property has been affected by a sustained period of long-term vacancy and that proactive marketing has been undertaken by a property agent for a minimum of 12 months in an effort to secure tenants. The marketing report should include:
• Details of the existing use or previous use if vacant;
• The length of time the unit has been vacant, if applicable;
• The type of use which the unit has been marketed for, what the marketing strategy involved and its duration;
• The amount of interest in the unit during the marketing period – this should detail the number of queries, the type of uses sought, and if known, the reason for not pursuing any initial enquiries."
However, nowhere in the draft policy wording does it explicitly state to include 12 months of marketing activity. The draft supporting text reads as though this is a policy requirement, rather than supportive guidance. This is contrary to caselaw which confirms that supporting text cannot be used to expand the policy beyond its wording (R (Cherkley Campaign Ltd) v Mole Valley District Council). A proposal could meet the requirements of the criteria sets out in draft policy RCS1 without being marketed for a minimum of 12 months. If the Plan is adopted as currently set out, there is a risk of internal inconsistency between policy RSC1 and the supporting text. Accordingly, this would fail Test 2 (Is the plan appropriate?) as it is not coherent or consistent.
We also have concerns with criterion 5 which states to "Avoid an over-concentration of non-retail uses that would undermine the retail function of the centre". This is because 'over-concentration' has not been defined within the draft policy. This contrasts with draft policy RCS3 which includes a definition of what an over-concentration of hot food takeaways would be. Without a definition of what an over-concentration of non-retail uses is, the draft policy will remain and lack clarity. Additionally, without a definition, the draft policy may fail Tests 2 and 3 as it is currently unclear (Test 2: Is the plan appropriate?) and cannot be effective (Test 3: Will the plan deliver?).

At present, we consider the Deposit Plan inadequately supports the Welsh language. Although the Welsh Language is included within Objective 6 (Embracing Culture and Heritage), the Deposit Plan does not contain a policy which seeks to promote the Welsh language, nor is the promotion of the Welsh language referenced in other Deposit Plan policies where this may be appropriate. Without a clear policy, applicants do not need to explicitly consider impact on the Welsh language so the role of the RLDP will be limited.
Local Development Plans should accord with national policy and guidance. For instance, the supporting text to Policy 1 of Future Wales states that "Key issues, including … the Welsh language, are core elements of policy 1 and are common threads underpinning all Future Wales policies." However, we believe that the Welsh language is not currently underpinning the policies within the Deposit Plan.
Additionally, paragraph 3.25 of PPW states that "The Welsh language is part of the social and cultural fabric and its future well being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. The land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its, use and the Thriving Welsh Language well being goal." Paragraph 3.29 goes on to suggest language impact assessments are required for "large developments not allocated in a development plan which are proposed in areas of particular sensitivity or importance for the language" with these areas defined in the LDP. In this instance, PPW sets out guidance for developers which is not present in the Deposit Plan.
The Vale of Glamorgan Council commissioned AECOM to produce the Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan (November 2025). Paragraph 9.5.9 recommends including a specific policy that supports and protects the Welsh language within the Deposit Plan. This contrasts with the Welsh Language (November 2025) Background paper, produced by the VoGC, which concludes that a specific Welsh Language policy is not warranted, albeit it does acknowledge the Plan's statutory duty to consider the Welsh language and embed relevant provisions within broader thematic policies. However, this is currently lacking as the Deposit Plan does not reference the Welsh language within other policies. Although the Background Paper considers that the RLDP is "unlikely to adversely affect the existing patterns of Welsh language use within the Vale of Glamorgan", the Plan should seek to promote the Welsh language.
Developers should be encouraged to promote the Welsh language where this may be reasonable and appropriate e.g. bilingual signage and announcements. Lidl actively promotes the Welsh language through their business. The Deposit Plan should be amended to strengthen the importance of the Welsh language, helping to meet Objective 6 over the RLDP period. Overall, without clear Welsh Language policy promotion, the Deposit Plan cannot positively impact the Welsh language. The Deposit Plan needs to go further.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rm
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rn
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4ry
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rp
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rq
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4sr

7225 Object

Document Element: Land at Bridge House Farm,

Respondent: Ms Samantha Hall [1432]

Summary:

The approval of the Lidl in Llanmaes contravenes your own principles and it is out of town A1 food store. I fully support your policy RCS2 and wish that the members of the planning committee were aware of their own policies before their made such an horrendous decision to approve the planning application.

Full text:

This shows how the approval of the Lidl in Llanmaes contravenes your own principles and it is out of town A1 food store. I fully support this proposal and wish that the members of the planning committee were aware of their own policies before their made such an horrendous decision to approve the planning application.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6721 Comment

Document Element: RCS1 - RESILIENT RETAIL, COMMERCIAL AND SERVICE CENTRES

Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail
centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer
supply chains. This limits opportunities for strengthening local food economies. It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for 'local affordable food' outlined in SP5.

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning
guidance (SPG) proposed. We are keen to ensure that these SPG's are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are
involved in the development of some of these. The content and application of the SPG's will be fundamental to the effectiveness of several of the policies identified in the
deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community
amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: "The Local Development Plan will support resilient and sustainable
local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part
of sustainable growth."

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local
diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

"Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other
opportunities for local food production as part of multifunctional green infrastructure."

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their
proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative
impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

6.54 We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live
full, productive and prosperous lives.'

6.60 We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid
HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to
ensure Developers submit a quality HIA and implement the conclusions.

6.61 Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

6.62 Wales Health Impact Assessment Support Unit has recently released guidance on HIA - see https://phwwhocc.co.uk/whiasu/ for more information and toolkits to ensure most up to date is in use.

6.63 Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the community..'.

6.65 Suggestion to change wording from 'encouraged' to 'expected' for example:
Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement
for HIA will assist with this expectation.

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference “enhancements to leisure, sport and recreation spaces”. Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation. It is recommended that the Key Site schedules include minimum on-site provision standards and delivery
phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population
growth.

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail
centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer
supply chains. This limits opportunities for strengthening local food economies.
It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for ‘local affordable food’ outlined in SP5.

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach.”

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to
consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and
Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: “Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food
infrastructure within walking distance of new residential areas.” This addresses diet related health inequalities, encourages healthier communities and aligns with HIA
guidance.

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply
chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable
agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models.

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses - to include the following wording: “Rural diversification proposals that support agro-ecological farming, sustainable local food production,
community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations.”

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel
Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022
01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing
flooding and making use more comfortable during hot weather (such as shading from trees). We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

SP13 Community infrastructure and planning obligations:

We want to take this opportunity to highlight the challenges that population growth places on healthcare
services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure. Please refer to the information provided as part of the background evidence paper titled 'BP37
Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within
existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new
developments to take forward its strategic objectives.

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space Assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres. Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.”
There is no reference to the expectation that local communities are consulted in relation to the development of community facilities. We would like to see a
requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and
challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities
that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales’ push for local supply resilience, this is a major opportunity gap. Consider including the following wording:

“Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains.” This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or
urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: “Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing.”

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food
production, short supply chains or sustainable farming practices.
Consider including the following wording: “Development proposals should encourage short supply chains, low-carbon farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives.”

Change suggested by respondent:

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains
within town and service centres, in line with the Town Centres First approach.”

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

6943 Support

Document Element: RCS1 - RESILIENT RETAIL, COMMERCIAL AND SERVICE CENTRES

Respondent: Penarth Town Council (Mr Pete Newton, Principal Policy, Innovation and Development Officer) [1125]

Summary:

Members were pleased to see mention of the diversification of high streets, although noted that Penarth was above average in terms of occupancy. They hoped that the RLDP would be able to support the town centre and support other ways it could be improved, such as a fishmonger or identifying a site for a new Cemetery.

Full text:

Penarth Town Council Deposit RLDP Consultation Response

Comments collated at a meeting of the Council’s Consultation Task and Finish Group on 9th February 2026

Some Members attended the RLDP consultation drop-in session in Penarth and in general found it to be very informative.

Members support the general development strategy but did note the lack of information concerning discussions with adjacent and other nearby Principal Councils in the CJC Region. In view of the forthcoming Strategic Development Plan, encompassing the ten authorities, members felt that some further commentary regarding this is warranted.1

It is clear that the approach taken in the Cardiff paper is still that ideally, each Council is self-contained and “consumes its own smoke,” which does not show any wider strategic thinking between the ten authorities in preparation for a regional Strategic Development Plan.

Members agreed with the view that infrastructure to support new housing developments was required in order to create successful developments, although they acknowledged that logistically it was difficult to pre-empt demand for some services such as travel and health services. Members also noted that predicting developmental needs and opportunities within wider context surrounding the UK’s economic, political, and social landscapes.

Members noted that there was not much focus on Penarth or identified potential future development for Penarth beyond that already underway at the location near to Cosmeston but welcomed flexibility in its approach. Members expected to be more closely involved in the decisions and planning of this, and other such developments, and provide opportunity for wider consultation where appropriate, such as pre-application consultations, as well as would expect to be included in consultations concerning sites adjacent to Llandough, Dinas Powys, and Sully given their impact upon the town.

Penarth as a town is currently developed to its boundaries, save for the development at Cosmeston. It is, therefore, more dependent than other Service Centres on windfalls of land or buildings which may arise during the currency of the Plan. In 2023, an extensive assessment of the potential of the town concluded the following:

“There is marginally less capacity in Penarth [and Llandough] than the projected figures. However, this does not mean that the projections are incorrect or unjustifiable. The reported figures have not included a significant amount of capacity on open space land, and the projected figures for conversion of existing buildings and intensifications will be surpassed if the extant consents that exist this early in the Plan period are implemented.”

The degree of flexibility, however, is substantially depending on one large site. P009, Headland School, is identified as both a potentially disused building and as a site with a capacity of 111-120 units. This special school is full to capacity and used by many Council in both Wales and England.

Members did note the inclusion of Cogan Transport Interchange under section 6.196 but would have liked to see more information about its future developments as they see it as key to increasing public transport use to Barry and further to West Wales in general.

Members wished to advise that issues with both the bridge and the platforms at Cogan have been long term, with accessibility being central to these issues. Members felt that improvements to accessibility should be a priority at this site, with planting and landscaping considered secondary to this.

Members felt it was key to consider the additional stress on Penarth from increased anticipated demand of public

transport needs and emphasised the need for this to be aptly considered by bus route providers as part of development work.

Members wanted to see a strategy that actively protects the town's heritage and culture whilst still being able to provide for current and future generations.

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16 and section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report2, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Under CC2, it was noted that the presumption against demolition3 in favour of retrofit and reuse may constrain maximum transition to net zero as, whilst there is grant aid available for public buildings and social housing, the retrofit monies available for private stock is limited.

Additional considerations will also need to be made as part of the Third Carbon Budget (2026-2030), Local Area Energy Plans and the climate change ISA theme.

Members also felt similar about the inclusion and consideration of sustainable development through the specific strategy outlined in section 5 of the document and felt this linked in well with ongoing Placemaking work and its strategic approach as detailed in SP4.

Members were pleased to see mention of the diversification of high streets, although noted that Penarth was above average in terms of occupancy. They hoped that the RLDP would be able to support the town centre and support other ways it could be improved, such as a fishmonger or identifying a site for a new Cemetery.

With Penarth classified as a Service Centre, they are identified as having a defined role. However, the decline of in-person retailing means that defining role is not that evident, and Members felt there is potentially a need to move away from the traditional retail role of Town Centres in favour of "repurposing, creating multifunctional, commercial, and service centres that meet the needs of the communities they serve" in line with Future Wales Town Centre First Policy. The term 'repurposing' suggests a stronger role for the public sector in enabling these new purposes, and Members felt that Placemaking Plans could be one potential framework for this.

Members felt that potential functional support that could be provided could include:
• The appointment of a Town Centre Manager
• Using supporting interventions such as an extension or reshaping of normal services such as Neighbourhood Services.
• Using existing or emerging new powers, such as compulsory purchases.

Members wished for the RLDP to facilitate the safeguarding of essential public services, including health, policing, fire and rescue in the town, which would help to develop the defining role of a Service Centre, and felt that specific reference to these would be beneficial.

Members supported the avoidance of coalescence with adjacent settlements through the reconfirmation of Green Wedges as it allows for relevant extensions to those settlements whilst allowing them to retain their identity.

Members noted that the Quiet Area provision under DNP6 only applies to Penarth and wished to know why this was the case.

Members advised that they welcomed further opportunity for consultation, particularly in relation to developments in the neighbouring Cardiff Bay area whilst acknowledging that this is not necessarily an RLDP concern.

Footnotes

1 There is an evidence paper concerning relations with Cardiff and a Statement of Common Ground with Bridgend. However, there is only a reference in the RLDP text to discussions with other regional Councils and not the paper itself. We would be grateful if you could provide the paper as it does impact on the soundness of this Plan.

2The UK Climate Change Committee's 'Progress Report: Reducing Emissions in Wales' highlighted the following aspects of import: Skills, Vehicle Charging Networks, Improving Recycling, Energy Plans, Decarbonising Public Buildings and Social Housing, and reducing Road transport Demand (Car-Kilometres).

3The UK Environmental Audit Committee (2022) noted that "the evidence we received consistently recommended that retrofit and reuse be prioritised over new build."

Change suggested by respondent:

-

Sound: Not specified

Attachments:
Email Representation - https://valeofglamorgan.oc2.uk/a/3d5

7020 Object

Document Element: RCS1 - RESILIENT RETAIL, COMMERCIAL AND SERVICE CENTRES
Respondent: Lidl GB Limited [1459]
Agent: CarneySweeney

Summary:

The Policy RCS1 (Resilient retail, commercial and service centres) supporting text adds new policy requirements which are not within the draft policy. Paragraph 6.214 states that:
"Changes of use class in Retail, Commercial and Service Centres must be justified by evidence that the property has been affected by a sustained period of long-term vacancy and that proactive marketing has been undertaken by a property agent for a minimum of 12 months in an effort to secure tenants. The marketing report should include:
• Details of the existing use or previous use if vacant;
• The length of time the unit has been vacant, if applicable;
• The type of use which the unit has been marketed for, what the marketing strategy involved and its duration;
• The amount of interest in the unit during the marketing period – this should detail the number of queries, the type of uses sought, and if known, the reason for not pursuing any initial enquiries."
However, nowhere in the draft policy wording does it explicitly state to include 12 months of marketing activity. The draft supporting text reads as though this is a policy requirement, rather than supportive guidance. This is contrary to caselaw which confirms that supporting text cannot be used to expand the policy beyond its wording (R (Cherkley Campaign Ltd) v Mole Valley District Council). A proposal could meet the requirements of the criteria sets out in draft policy RCS1 without being marketed for a minimum of 12 months. If the Plan is adopted as currently set out, there is a risk of internal inconsistency between policy RSC1 and the supporting text. Accordingly, this would fail Test 2 (Is the plan appropriate?) as it is not coherent or consistent.
We also have concerns with criterion 5 which states to "Avoid an over-concentration of non-retail uses that would undermine the retail function of the centre". This is because 'over-concentration' has not been defined within the draft policy. This contrasts with draft policy RCS3 which includes a definition of what an over-concentration of hot food takeaways would be. Without a definition of what an over-concentration of non-retail uses is, the draft policy will remain and lack clarity. Additionally, without a definition, the draft policy may fail Tests 2 and 3 as it is currently unclear (Test 2: Is the plan appropriate?) and cannot be effective (Test 3: Will the plan deliver?).

Full text:

Draft RCS2 sets out three criteria for new A1, A2 or A3 uses on new sites or existing retail areas which are as follows:
1. "It can be demonstrated that there is an additional need for the proposal which cannot be provided within an existing retail, commercial and service centre; and
2. The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.
3. The proposal would serve local needs in a neighbourhood or rural village."
We consider the policy should read as follows:
"1 It can be demonstrated that there is an additional need for the proposal which, when applying the sequential approach to locating development as outlined in national guidance, it has been demonstrated that the site is sequentially preferable; and
2 The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.
3 Proposals serving only local needs should be of a scale and type which does not undermine the vibrancy, attractiveness and viability of neighbourhood centres."

The settlement boundary, defined by Policy SP2, excludes allocation site SP12 'Land at Bridge House Farm, Llanmaes, Llantwit Major' which is for a retail foodstore. Instead, the draft allocation abuts, but lies outside, the settlement boundary as currently drawn. Although draft Policy SP3 states that "Areas outside settlement boundaries that are not allocated or protected for a specific use will be defined as countryside we consider the settlement boundary must be extended at this location to include the allocation. Its exclusion is illogical and would fail to reflect the 'on the ground' position when this allocation is delivered. Moreover, its exclusion could confuse and may constrain any future minor development changes at the site (e.g. those needed to meet operational needs the subject of any planning application).
The draft proposals map shows the allocation as a dot which does not cover the full extent of the allocation. See below:
See plan in attachment
By not including the extent of the site/allocation within the defined settlement boundary, the draft plan fails to recognise the allocation will form an important part of the settlement, the delivery of which is crucial to meeting identified needs. Accordingly, we believe this fails Test 2 (Is the plan appropriate?), and it may fail Test 3 (Will the plan deliver) as its exclusion from the boundary may unduly impact the future site operation.

Lidl Great Britain Ltd objects to draft policy SP11 (Retail, commercial and service centre hierarchy) as worded as it fails to meet Test 2 (Is the plan appropriate?). Draft Policy SP11 sets out the proposed retail hierarchy (See extract below), but it does not accord with the settlement hierarchy as set out in draft Policy SP2 and it is not justified.
The adopted LDP Settlement Hierarchy lists:

Key Settlement: Barry
Service Centre Settlements: Cowbridge, Llantwit Major and Penarth
The adopted LDP Retail hierarchy lists:
Town centres: Barry
District centres: Barry (high street/broad street), Cowbridge, Llantwit Major, Penarth
Draft SP2 of the Deposit Plan identifies Cowbridge, Llantwit Major and Penarth as Service Centre Settlements in the Settlement Hierarchy.
However, draft SP11 lists a retail hierarchy as follows:
Town Centres – Barry (Holton Rd), Penarth, Cowbridge
District Centres – Barry (High Street), Llantwit Major
It is unexplained and unjustified that the SP11 retail hierarchy upgrades Cowbridge to Town Centre status, while Llantwit Major and Barry High Street remain District Centres.
The Deposit Plan includes two retail allocations, neither are intended to directly serve Penarth or Cowbridge. Cowbridge is not a focus for growth. It is therefore unjustified that Llantwit Major, which is served by a train station, is a settlement roughly twice the size of Cowbridge (by population) and is a manifestly more sustainable location and more appropriate focus for growth, is proposed to rank below Cowbridge in the retail hierarchy. Barry, Penarth and Llantwit Major should rank as Town Centres as the most sustainable locations for growth.
Penarth is an accessible settlement and an appropriate focus for growth. Indeed, the Council's BP13 (Retail and Commercial Leisure Study (June 2023)) recommends a medium to large supermarket to serve Penarth (Zone 5) but the Deposit Plan is absent of any food retail allocation for Penarth/Llandough. In addition to Llantwit Major and St Athan (Deposit Policy SP12) Penarth should be a focus for additional convenience provision over the plan period.

SP12 – RETAIL FLOORSPACE PROVISION
Lidl Great Britain Ltd firmly supports the allocation within draft Policy SP12 (Retail Floorspace Provision) for 1,251sqm of convenience floorspace at Land at Bridge House Farm, Llanmaes, Llantwit Major. This allocation is needed to ensure the plan is sound, by addressing unmet need at Llantwit Major which is a Service Centre and focus for growth. This should be made clear in the reasoned justification.
In respect to Penarth, Policy SP12, together with supporting paragraphs 6.208–6.210, do not, however, adequately reflect the findings of the Council's Retail & Leisure Study (BP13). Policy SP12 should also plan positively for the identified convenience retail needs within Zone 5 (Penarth/ Llandough). BP13 confirms that Penarth District Centre is not served by a medium to larger supermarket (para. 9.2). The BP13 Study finds quantitative and qualitative capacity for a medium to larger supermarket by 2036 in Penarth (paras. 9.23, 12.24).
It finds overall quantitative convenience capacity of up to c.5,862sqm net floorspace (assuming deep discounter operators). In qualitative terms the following Centres have been identified in potential need for a medium to larger supermarket: Barry Holton Road town centre; Penarth district centre and Llantwit Major district centre. Quantitative and qualitative need is identified.
Despite the evidence of unmet need, the Deposit LDP Policy SP12 allocates only two sites for convenience retail totalling c. 3,109sqm net; one site at Llanwit Major and a second site at St Athan. This is below the overall (up to 4,282–5,862sqm net) requirement identified in BP13. The allocation of land at Llantwit Major aligns with the evidence base, has been thoroughly tested at application stage and this is fully supported.
Policy SP12 is silent on the need for additional floorspace at Penarth/Llandough (Zone 5) and as such does not reflect the evidence base findings and address identified need in Penarth, with a 'residual' quantitative capacity of c.1,173–2,753sqm net unmet/unallocated. We note Policy SP12 states that any additional convenience and comparison retail floorspace beyond that provided by the identified sites should be directed towards the town and district centres outlined in Policy SP11. However, this merely reflects national guidance in respect to directing growth to town/district centres (i.e. applying a sequential approach). The Policy should go further and seek to allocate the residual unmet need to Penarth/ Llandough. We note the BP13 is silent on additional need at St Athan.
Planning Policy Wales (PPW) 12 requires LPAs to identify the appropriate form, scale and location to meet retail needs (para. 4.3.8) and emphasises ensuring communities have access to adequate retail provision (para. 4.3.13). PPW therefore places a duty on LPAs to plan positively for evidenced retail needs. In respect to Penarth/Llandough Policy SP12 should seek to address this requirement.
Under PPW and TAN4, LPAs must apply the sequential test, directing new retail development to locations that are:
• In-centre,
• Edge-of-centre, and only then,
• Out-of-centre locations that are accessible and well-connected to the catchment.
Penarth Centre is physically constrained. In the absence of any in-centre or edge-of-centre sites capable of accommodating a medium/larger supermarket, the next sequentially preferable option is the most accessible, well-connected site within the same catchment, capable of meeting identified need and reducing expenditure leakage.
Policy SP12 should plan positively for needs in Zone 5 (Penarth/Llandough) and include provision for a medium to large convenience foodstore in Zone 5 in accordance with BP13.
Enclosed with this representation is a separate representation (Under 8. New site submission) promoting a site for food retail development to meet identified needs within the Zone 5 Penarth/Llandough catchment. The site is considered accessible and sequentially preferable to meeting identified needs in Penarth.
The policy should be clear that identified need should be delivered in accordance with the sequential approach as set out in national guidance. As set out in Policy SP12 any additional convenience and comparison retail floorspace beyond that provided by identified sites should be directed towards the town and district centres in accordance with the sequential approach. We support that the inclusion of retail floorspace as part of a mix of uses on allocated sites will also be supported.

POLICY DNP2 – GREEN WEDGES
Lidl objects to the inclusion of land at Penlan Road, Llandough (see Site Location Plan, drawing no. 3744 F420) within the Green Wedge designation under Policy DNP2. The site forms a distinct and enclosed parcel of land on the north-eastern edge of the designated Green Wedge, and its physical characteristics demonstrate that it does not serve the strategic purposes of the wider designation.
The northern and western boundaries are formed by Llandough Hospital, including the hospital access road and surface car parking, which clearly separate the site from the wider Green Wedge. The southern boundary is defined by residential properties along Corbett Road and the Merrier Harrier public house. The south-western and western boundaries are formed by further residential properties within Llandough. As such, built development extends beyond the site in multiple directions, meaning it does not contribute to the open land between settlements that Green Wedges are intended to protect.
The site is physically and visually contained with strong, defensible boundaries. Its close association with existing built form means that it does not exhibit the level of openness required for Green Wedge designation under PPW or BP27. BP27 requires Green Wedge boundaries to include only land that must remain open in the long term. When assessed against the four-stage SE Wales Green Wedge methodology, the site performs weakly. In terms of openness (Stage A), the site has low perceived openness as it is enclosed by development. Under development pressure (Stage B), the influence of surrounding built form means the site is already urban in character. In relation to Green Wedge purposes (Stage C), the site does not materially contribute to preventing coalescence, safeguarding open countryside, or protecting the setting of an urban area. The conclusion (Stage D) is therefore that the site's inclusion within the Green Wedge is anomalous.
Recent decisions in the emerging RLDP, such as the allocation of HG1 KS2, demonstrate that selective Green Wedge boundary amendments are acceptable where supported by evidence. Not all areas within the current designation are equally sensitive, and the site represents one of the least sensitive parts.
The Council's own evidence further supports the suitability of the land for development. The site does not lie within the Special Landscape Area that covers much of the remaining Green Wedge, highlighting its lower landscape sensitivity. The Candidate Site Assessment (BP18a examined the wider parcel (Site ID 400) for housing and concluded that it would form a natural extension to the Llandough settlement boundary. It noted that the land would represent an incursion only if less sensitive sites could not be delivered and discounted the site solely because housing need had been met elsewhere, not due to landscape or Green Wedge harm. This confirms the Council recognises the land is capable of development. The same land can therefore appropriately meet other evidenced needs, including retail provision.
In separate representations, Lidl is promoting land to the south of Llandough Hospital via 'RDLP New site submissions'. It is considered that the site can be developed in a low-impact, landscape-led and sensitively designed manner that respects its transitional position between the urban edge and the wider Green Wedge. A modest single storey medium sized foodstore delivers a built form that can sit comfortably below surrounding tree lines and hospital structures. A comprehensive landscape strategy, including reinforced boundary planting, native woodland edge enhancement, and carefully designed building can soften building edges, strengthen the site's defensible boundaries, and integrate the scheme with its surroundings. The development would therefore appear as an infill of the existing urban area, rather than any intrusion into the open countryside, and can be designed to maintain the wider Green Wedge's openness and character by delivering a strong defensible physical boundary which prevents any further development beyond the site.
As set out in separate representations the Council's Retail and Leisure Study (BP13) identifies a clear quantitative and qualitative need for a medium to larger supermarket within Zone 5, alongside notable levels of convenience expenditure leakage to Zone 3 (Cardiff). The promoted site is well positioned to intercept this leakage, meet the identified convenience floorspace requirement, and provide improved local convenience retail provision for Llandough/Penarth. There is, therefore, a clear needs-based justification for release of this parcel of land from the Green Wedge designation.
The Green Wedge boundary should be amended at this location to remove the promoted site from Policy DNP2 (Green Wedge designation) and from the Proposals Map. In parallel, the settlement boundary defined by Policy SP2 should be realigned to include the promoted site, reflecting the site's physical relationship with existing development, its defensible boundaries, and its suitability to meet an evidenced strategic retail need.

The Policy text should be changed as follows:
"Proposals involving the change of use at ground floor level uses from A1 retail use within Service Centres will permitted where the proposal would:…"
The Policy RCS1 (Resilient retail, commercial and service centres) supporting text adds new policy requirements which are not within the draft policy. Paragraph 6.214 states that:
"Changes of use class in Retail, Commercial and Service Centres must be justified by evidence that the property has been affected by a sustained period of long-term vacancy and that proactive marketing has been undertaken by a property agent for a minimum of 12 months in an effort to secure tenants. The marketing report should include:
• Details of the existing use or previous use if vacant;
• The length of time the unit has been vacant, if applicable;
• The type of use which the unit has been marketed for, what the marketing strategy involved and its duration;
• The amount of interest in the unit during the marketing period – this should detail the number of queries, the type of uses sought, and if known, the reason for not pursuing any initial enquiries."
However, nowhere in the draft policy wording does it explicitly state to include 12 months of marketing activity. The draft supporting text reads as though this is a policy requirement, rather than supportive guidance. This is contrary to caselaw

which confirms that supporting text cannot be used to expand the policy beyond its wording (R (Cherkley Campaign Ltd) v Mole Valley District Council). A proposal could meet the requirements of the criteria sets out in draft policy RCS1 without being marketed for a minimum of 12 months. If the Plan is adopted as currently set out, there is a risk of internal inconsistency between policy RSC1 and the supporting text. Accordingly, this would fail Test 2 (Is the plan appropriate?) as it is not coherent or consistent.
We also have concerns with criterion 5 which states to "Avoid an over-concentration of non-retail uses that would undermine the retail function of the centre". This is because 'over-concentration' has not been defined within the draft policy. This contrasts with draft policy RCS3 which includes a definition of what an over-concentration of hot food takeaways would be. Without a definition of what an over-concentration of non-retail uses is, the draft policy will remain and lack clarity. Additionally, without a definition, the draft policy may fail Tests 2 and 3 as it is currently unclear (Test 2: Is the plan appropriate?) and cannot be effective (Test 3: Will the plan deliver?).

At present, we consider the Deposit Plan inadequately supports the Welsh language. Although the Welsh Language is included within Objective 6 (Embracing Culture and Heritage), the Deposit Plan does not contain a policy which seeks to promote the Welsh language, nor is the promotion of the Welsh language referenced in other Deposit Plan policies where this may be appropriate. Without a clear policy, applicants do not need to explicitly consider impact on the Welsh language so the role of the RLDP will be limited.
Local Development Plans should accord with national policy and guidance. For instance, the supporting text to Policy 1 of Future Wales states that "Key issues, including … the Welsh language, are core elements of policy 1 and are common threads underpinning all Future Wales policies." However, we believe that the Welsh language is not currently underpinning the policies within the Deposit Plan.
Additionally, paragraph 3.25 of PPW states that "The Welsh language is part of the social and cultural fabric and its future well being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. The land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its, use and the Thriving Welsh Language well being goal." Paragraph 3.29 goes on to suggest language impact assessments are required for "large developments not allocated in a development plan which are proposed in areas of particular sensitivity or importance for the language" with these areas defined in the LDP. In this instance, PPW sets out guidance for developers which is not present in the Deposit Plan.
The Vale of Glamorgan Council commissioned AECOM to produce the Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan (November 2025). Paragraph 9.5.9 recommends including a specific policy that supports and protects the Welsh language within the Deposit Plan. This contrasts with the Welsh Language (November 2025) Background paper, produced by the VoGC, which concludes that a specific Welsh Language policy is not warranted, albeit it does acknowledge the Plan's statutory duty to consider the Welsh language and embed relevant provisions within broader thematic policies. However, this is currently lacking as the Deposit Plan does not reference the Welsh language within other policies. Although the Background Paper considers that the RLDP is "unlikely to adversely affect the existing patterns of Welsh language use within the Vale of Glamorgan", the Plan should seek to promote the Welsh language.
Developers should be encouraged to promote the Welsh language where this may be reasonable and appropriate e.g. bilingual signage and announcements. Lidl actively promotes the Welsh language through their business. The Deposit Plan should be amended to strengthen the importance of the Welsh language, helping to meet Objective 6 over the RLDP period. Overall, without clear Welsh Language policy promotion, the Deposit Plan cannot positively impact the Welsh language. The Deposit Plan needs to go further.

Change suggested by respondent:

The Policy text should explicitly state to include 12 months of marketing activity as a requirement as the supporting text currently reads. Criterion 5 should also define what an over-concentration of non-retail uses would be in order that the policy is clear and effective.

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rm
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rn
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4ry
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rp
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rq
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4sr

5584 Support

Document Element: RCS2 – EDGE OF CENTRE AND OUT OF TOWN RETAILING

Respondent: Ms Samantha Hall [1432]

Summary:

This shows how the approval of the Lidl in Llanmaes contravenes your own principles and it is out of town A1 food store. I fully support this proposal and wish that the members of the planning committee were aware of their own policies before their made such an horrendous decision to approve the planning application.

Full text:

This shows how the approval of the Lidl in Llanmaes contravenes your own principles and it is out of town A1 food store. I fully support this proposal and wish that the members of the planning committee were aware of their own policies before their made such an horrendous decision to approve the planning application.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6683 Comment

Document Element: RCS2 – EDGE OF CENTRE AND OUT OF TOWN RETAILING

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.
We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.
Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.
Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how

good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where "qualifying activities" take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing

capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states 'The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.'
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in

Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery. Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA) identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'

Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.

The Vale of Glamorgan Older Persons Housing Strategy

2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."

All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.

South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.

Violence Against Women and Girls:

The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.

In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.

Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at: https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf

South Wales Police recommendations:

• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.

• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.

• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.

• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.

• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.

• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.

• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.

• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.

• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.

• HG6 – PROVISION OF SPECIALIST ACCOMMODATION

The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –

-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.

• The Vale of Glamorgan Older Persons Housing Strategy:

'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that

meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design

guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be

consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled

with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

7014 Object

Document Element: RCS2 – EDGE OF CENTRE AND OUT OF TOWN RETAILING
Respondent: Lidl GB Limited [1459]
Agent: CarneySweeney

Summary:

Draft RCS2 sets out three criteria for new A1, A2 or A3 uses on new sites or existing retail areas which are as follows:
1. “It can be demonstrated that there is an additional need for the proposal which cannot be provided within an existing retail, commercial and service centre; and
2. The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.
3. The proposal would serve local needs in a neighbourhood or rural village.”

Full text:

Draft RCS2 sets out three criteria for new A1, A2 or A3 uses on new sites or existing retail areas which are as follows:
1. “It can be demonstrated that there is an additional need for the proposal which cannot be provided within an existing retail, commercial and service centre; and
2. The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.
3. The proposal would serve local needs in a neighbourhood or rural village.”
We consider the policy should read as follows:
“1 It can be demonstrated that there is an additional need for the proposal which, when applying the sequential approach to locating development as outlined in national guidance, it has been demonstrated that the site is sequentially preferable; and
2 The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.
3 Proposals serving only local needs should be of a scale and type which does not undermine the vibrancy, attractiveness and viability of neighbourhood centres.”

The settlement boundary, defined by Policy SP2, excludes allocation site SP12 ‘Land at Bridge House Farm, Llanmaes, Llantwit Major’ which is for a retail foodstore. Instead, the draft allocation abuts, but lies outside, the settlement boundary as currently drawn. Although draft Policy SP3 states that “Areas outside settlement boundaries that are not allocated or protected for a specific use will be defined as countryside we consider the settlement boundary must be extended at this location to include the allocation. Its exclusion is illogical and would fail to reflect the ‘on the ground’ position when this allocation is delivered. Moreover, its exclusion could confuse and may constrain any future minor development changes at the site (e.g. those needed to meet operational needs the subject of any planning application).

The draft proposals map shows the allocation as a dot which does not cover the full extent of the allocation. See below: See plan in attachment
By not including the extent of the site/allocation within the defined settlement boundary, the draft plan fails to recognise the allocation will form an important part of the settlement, the delivery of which is crucial to meeting identified needs. Accordingly, we believe this fails Test 2 (Is the plan appropriate?), and it may fail Test 3 (Will the plan deliver) as its exclusion from the boundary may unduly impact the future site operation.

Lidl Great Britain Ltd objects to draft policy SP11 (Retail, commercial and service centre hierarchy) as worded as it fails to meet Test 2 (Is the plan appropriate?). Draft Policy SP11 sets out the proposed retail hierarchy (See extract below), but it does not accord with the settlement hierarchy as set out in draft Policy SP2 and it is not justified.
The adopted LDP Settlement Hierarchy lists:
Key Settlement: Barry
Service Centre Settlements: Cowbridge, Llantwit Major and Penarth
The adopted LDP Retail hierarchy lists:
Town centres: Barry
District centres: Barry (high street/broad street), Cowbridge, Llantwit Major, Penarth
Draft SP2 of the Deposit Plan identifies Cowbridge, Llantwit Major and Penarth as Service Centre Settlements in the Settlement Hierarchy.
However, draft SP11 lists a retail hierarchy as follows:
Town Centres – Barry (Holton Rd), Penarth, Cowbridge
District Centres – Barry (High Street), Llantwit Major
It is unexplained and unjustified that the SP11 retail hierarchy upgrades Cowbridge to Town Centre status, while Llantwit Major and Barry High Street remain District Centres.
The Deposit Plan includes two retail allocations, neither are intended to directly serve Penarth or Cowbridge. Cowbridge is not a focus for growth. It is therefore unjustified that Llantwit Major, which is served by a train station, is a settlement roughly twice the size of Cowbridge (by population) and is a manifestly more sustainable location and more appropriate focus for growth, is proposed to rank below Cowbridge in the retail hierarchy. Barry, Penarth and Llantwit Major should rank as Town Centres as the most sustainable locations for growth.
Penarth is an accessible settlement and an appropriate focus for growth. Indeed, the Council's BP13 (Retail and Commercial Leisure Study (June 2023)) recommends a medium to large supermarket to serve Penarth (Zone 5) but the Deposit Plan is absent of any food retail allocation for Penarth/Llandough. In addition to Llantwit Major and St Athan (Deposit Policy SP12) Penarth should be a focus for additional convenience provision over the plan period.

SP12 – RETAIL FLOORSPACE PROVISION
Lidl Great Britain Ltd firmly supports the allocation within draft Policy SP12 (Retail Floorspace Provision) for 1,251sqm of convenience floorspace at Land at Bridge House Farm, Llanmaes, Llantwit Major. This allocation is needed to ensure the plan is sound, by addressing unmet need at Llantwit Major which is a Service Centre and focus for growth. This should be made clear in the reasoned justification.
In respect to Penarth, Policy SP12, together with supporting paragraphs 6.208–6.210, do not, however, adequately reflect the findings of the Council's Retail & Leisure Study (BP13). Policy SP12 should also plan positively for the identified convenience retail needs within Zone 5 (Penarth/ Llandough). BP13 confirms that Penarth District Centre is not served by a medium to larger supermarket (para. 9.2). The BP13 Study finds quantitative and qualitative capacity for a medium to larger supermarket by 2036 in Penarth (paras. 9.23, 12.24).
It finds overall quantitative convenience capacity of up to c.5,862sqm net floorspace (assuming deep discounter operators). In qualitative terms the following Centres have been identified in potential need for a medium to larger supermarket: Barry Holton Road town centre; Penarth district centre and Llantwit Major district centre. Quantitative and qualitative need is identified.
Despite the evidence of unmet need, the Deposit LDP Policy SP12 allocates only two sites for convenience retail totalling c. 3,109sqm net; one site at Llanwit Major and a second site at St Athan. This is below the overall (up to 4,282–5,862sqm net) requirement identified in BP13. The allocation of land at Llantwit Major aligns with the evidence base, has been thoroughly tested at application stage and this is fully supported.
Policy SP12 is silent on the need for additional floorspace at Penarth/Llandough (Zone 5) and as such does not reflect the evidence base findings and address identified need in Penarth, with a 'residual' quantitative capacity of c.1,173–2,753sqm net unmet/unallocated. We note Policy SP12 states that any additional convenience and comparison retail floorspace beyond that provided by the identified sites should be directed towards the town and district centres outlined in Policy SP11. However, this merely reflects national guidance in respect to directing growth to town/district centres (i.e. applying a sequential approach). The Policy should go further and seek to allocate the residual unmet need to Penarth/ Llandough. We note the BP13 is silent on additional need at St Athan.
Planning Policy Wales (PPW) 12 requires LPAs to identify the appropriate form, scale and location to meet retail needs (para. 4.3.8) and emphasises ensuring communities have access to adequate retail provision (para. 4.3.13). PPW therefore places a duty on LPAs to plan positively for evidenced retail needs. In respect to Penarth/Llandough Policy SP12 should seek to address this requirement.
Under PPW and TAN4, LPAs must apply the sequential test, directing new retail development to locations that are:
• In-centre,
• Edge-of-centre, and only then,
• Out-of-centre locations that are accessible and well-connected to the catchment.
Penarth Centre is physically constrained. In the absence of any in-centre or edge-of-centre sites capable of accommodating a medium/larger supermarket, the next sequentially preferable option is the most accessible, well-

connected site within the same catchment, capable of meeting identified need and reducing expenditure leakage.
Policy SP12 should plan positively for needs in Zone 5 (Penarth/Llandough) and include provision for a medium to large convenience foodstore in Zone 5 in accordance with BP13.
Enclosed with this representation is a separate representation (Under 8. New site submission) promoting a site for food retail development to meet identified needs within the Zone 5 Penarth/Llandough catchment. The site is considered accessible and sequentially preferable to meeting identified needs in Penarth.
The policy should be clear that identified need should be delivered in accordance with the sequential approach as set out in national guidance. As set out in Policy SP12 any additional convenience and comparison retail floorspace beyond that provided by identified sites should be directed towards the town and district centres in accordance with the sequential approach. We support that the inclusion of retail floorspace as part of a mix of uses on allocated sites will also be supported.

POLICY DNP2 – GREEN WEDGES
Lidl objects to the inclusion of land at Penlan Road, Llandough (see Site Location Plan, drawing no. 3744 F420) within the Green Wedge designation under Policy DNP2. The site forms a distinct and enclosed parcel of land on the north-eastern edge of the designated Green Wedge, and its physical characteristics demonstrate that it does not serve the strategic purposes of the wider designation.
The northern and western boundaries are formed by Llandough Hospital, including the hospital access road and surface car parking, which clearly separate the site from the wider Green Wedge. The southern boundary is defined by residential properties along Corbett Road and the Merrier Harrier public house. The south-western and western boundaries are formed by further residential properties within Llandough. As such, built development extends beyond the site in multiple directions, meaning it does not contribute to the open land between settlements that Green Wedges are intended to protect.
The site is physically and visually contained with strong, defensible boundaries. Its close association with existing built form means that it does not exhibit the level of openness required for Green Wedge designation under PPW or BP27. BP27 requires Green Wedge boundaries to include only land that must remain open in the long term. When assessed against the four-stage SE Wales Green Wedge methodology, the site performs weakly. In terms of openness (Stage A), the site has low perceived openness as it is enclosed by development. Under development pressure (Stage B), the influence of surrounding built form means the site is already urban in character. In relation to Green Wedge purposes (Stage C), the site does not materially contribute to preventing coalescence, safeguarding open countryside, or protecting the setting of an urban area. The conclusion (Stage D) is therefore that the site's inclusion within the Green Wedge is anomalous.
Recent decisions in the emerging RLDP, such as the allocation of HG1 KS2, demonstrate that selective Green Wedge boundary amendments are acceptable where supported by evidence. Not all areas within the current designation are equally sensitive, and the site represents one of the least sensitive parts.
The Council's own evidence further supports the suitability of the land for development. The site does not lie within the Special Landscape Area that covers much of the remaining Green Wedge, highlighting its lower landscape sensitivity. The Candidate Site Assessment (BP18a examined the wider parcel (Site ID 400) for housing and concluded that it would form a natural extension to the Llandough settlement boundary. It noted that the land would represent an incursion only if less sensitive sites could not be delivered and discounted the site solely because housing need had been met elsewhere, not due to landscape or Green Wedge harm. This confirms the Council recognises the land is capable of development. The same land can therefore appropriately meet other evidenced needs, including retail provision.
In separate representations, Lidl is promoting land to the south of Llandough Hospital via 'RDLP New site submissions'. It is considered that the site can be developed in a low-impact, landscape-led and sensitively designed manner that respects its transitional position between the urban edge and the wider Green Wedge. A modest single storey medium sized foodstore delivers a built form that can sit comfortably below surrounding tree lines and hospital structures. A comprehensive landscape strategy, including reinforced boundary planting, native woodland edge enhancement, and carefully designed building can soften building edges, strengthen the site's defensible boundaries, and integrate the scheme with its surroundings. The development would therefore appear as an infill of the existing urban area, rather than any intrusion into the open countryside, and can be designed to maintain the wider Green Wedge's openness and character by delivering a strong defensible physical boundary which prevents any further development beyond the site.
As set out in separate representations the Council's Retail and Leisure Study (BP13) identifies a clear quantitative and qualitative need for a medium to larger supermarket within Zone 5, alongside notable levels of convenience expenditure leakage to Zone 3 (Cardiff). The promoted site is well positioned to intercept this leakage, meet the identified convenience floorspace requirement, and provide improved local convenience retail provision for Llandough/Penarth. There is, therefore, a clear needs-based justification for release of this parcel of land from the Green Wedge designation.
The Green Wedge boundary should be amended at this location to remove the promoted site from Policy DNP2 (Green Wedge designation) and from the Proposals Map. In parallel, the settlement boundary defined by Policy SP2 should be realigned to include the promoted site, reflecting the site's physical relationship with existing development, its defensible boundaries, and its suitability to meet an evidenced strategic retail need.

The Policy text should be changed as follows:
"Proposals involving the change of use at ground floor level uses from A1 retail use within Service Centres will permitted where the proposal would:…"
The Policy RCS1 (Resilient retail, commercial and service centres) supporting text adds new policy requirements which

are not within the draft policy. Paragraph 6.214 states that:
"Changes of use class in Retail, Commercial and Service Centres must be justified by evidence that the property has been affected by a sustained period of long-term vacancy and that proactive marketing has been undertaken by a property agent for a minimum of 12 months in an effort to secure tenants. The marketing report should include:
• Details of the existing use or previous use if vacant;
• The length of time the unit has been vacant, if applicable;
• The type of use which the unit has been marketed for, what the marketing strategy involved and its duration;
• The amount of interest in the unit during the marketing period – this should detail the number of queries, the type of uses sought, and if known, the reason for not pursuing any initial enquiries."
However, nowhere in the draft policy wording does it explicitly state to include 12 months of marketing activity. The draft supporting text reads as though this is a policy requirement, rather than supportive guidance. This is contrary to caselaw which confirms that supporting text cannot be used to expand the policy beyond its wording (R (Cherkley Campaign Ltd) v Mole Valley District Council). A proposal could meet the requirements of the criteria sets out in draft policy RCS1 without being marketed for a minimum of 12 months. If the Plan is adopted as currently set out, there is a risk of internal inconsistency between policy RSC1 and the supporting text. Accordingly, this would fail Test 2 (Is the plan appropriate?) as it is not coherent or consistent.
We also have concerns with criterion 5 which states to "Avoid an over-concentration of non-retail uses that would undermine the retail function of the centre". This is because 'over-concentration' has not been defined within the draft policy. This contrasts with draft policy RCS3 which includes a definition of what an over-concentration of hot food takeaways would be. Without a definition of what an over-concentration of non-retail uses is, the draft policy will remain and lack clarity. Additionally, without a definition, the draft policy may fail Tests 2 and 3 as it is currently unclear (Test 2: Is the plan appropriate?) and cannot be effective (Test 3: Will the plan deliver?).

At present, we consider the Deposit Plan inadequately supports the Welsh language. Although the Welsh Language is included within Objective 6 (Embracing Culture and Heritage), the Deposit Plan does not contain a policy which seeks to promote the Welsh language, nor is the promotion of the Welsh language referenced in other Deposit Plan policies where this may be appropriate. Without a clear policy, applicants do not need to explicitly consider impact on the Welsh language so the role of the RLDP will be limited.
Local Development Plans should accord with national policy and guidance. For instance, the supporting text to Policy 1 of Future Wales states that "Key issues, including … the Welsh language, are core elements of policy 1 and are common threads underpinning all Future Wales policies." However, we believe that the Welsh language is not currently underpinning the policies within the Deposit Plan.
Additionally, paragraph 3.25 of PPW states that "The Welsh language is part of the social and cultural fabric and its future well being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. The land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its, use and the Thriving Welsh Language well being goal." Paragraph 3.29 goes on to suggest language impact assessments are required for "large developments not allocated in a development plan which are proposed in areas of particular sensitivity or importance for the language" with these areas defined in the LDP. In this instance, PPW sets out guidance for developers which is not present in the Deposit Plan.
The Vale of Glamorgan Council commissioned AECOM to produce the Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan (November 2025). Paragraph 9.5.9 recommends including a specific policy that supports and protects the Welsh language within the Deposit Plan. This contrasts with the Welsh Language (November 2025) Background paper, produced by the VoGC, which concludes that a specific Welsh Language policy is not warranted, albeit it does acknowledge the Plan's statutory duty to consider the Welsh language and embed relevant provisions within broader thematic policies. However, this is currently lacking as the Deposit Plan does not reference the Welsh language within other policies. Although the Background Paper considers that the RLDP is "unlikely to adversely affect the existing patterns of Welsh language use within the Vale of Glamorgan", the Plan should seek to promote the Welsh language.
Developers should be encouraged to promote the Welsh language where this may be reasonable and appropriate e.g. bilingual signage and announcements. Lidl actively promotes the Welsh language through their business. The Deposit Plan should be amended to strengthen the importance of the Welsh language, helping to meet Objective 6 over the RLDP period. Overall, without clear Welsh Language policy promotion, the Deposit Plan cannot positively impact the Welsh language. The Deposit Plan needs to go further.

Change suggested by respondent:

We consider the policy should read as follows:
"1 It can be demonstrated that there is an additional need for the proposal which, when applying the sequential approach to locating development as outlined in national guidance, it has been demonstrated that the site is sequentially preferable; and
2 The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.
3 Proposals serving only local needs should be of a scale and type which does not undermine the vibrancy, attractiveness and viability of neighbourhood centres."

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rm
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rn

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4ry
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rp
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rq
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4sr

5585 Support

Document Element: RCS3 - HOT FOOD TAKEAWAYS
Respondent: Ms Samantha Hall [1432]

Summary:

There is supposedly a cost of living crisis, but there is also a health crisis in this country fuelled by poor food choices. I fully support the proposal to limit take away premises within the vale.

Full text:

There is supposedly a cost of living crisis, but there is also a health crisis in this country fuelled by poor food choices. I fully support the proposal to limit take away premises within the vale.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

6723 Comment

Document Element: RCS3 - HOT FOOD TAKEAWAYS
Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to
consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and
Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning
guidance (SPG) proposed. We are keen to ensure that these SPG's are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are
involved in the development of some of these. The content and application of the SPG's will be fundamental to the effectiveness of several of the policies identified in the
deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community
amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient
communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: "The Local Development Plan will support resilient and sustainable
local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part
of sustainable growth."

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of

the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local
diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

“Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other
opportunities for local food production as part of multifunctional green infrastructure.”

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their
proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative
impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

6.54 We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live
full, productive and prosperous lives.'

6.60 We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid
HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to
ensure Developers submit a quality HIA and implement the conclusions.

6.61 Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

6.62 Wales Health Impact Assessment Support Unit has recently released guidance on HIA - see https://phwwhocc.co.uk/whiasu/ for more information and toolkits to ensure most up to date is in use.

6.63 Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the community..'.

6.65 Suggestion to change wording from 'encouraged' to 'expected' for example:
Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement
for HIA will assist with this expectation.

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference “enhancements to leisure, sport and recreation spaces”. Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation. It is recommended that the Key Site schedules include minimum on-site provision standards and delivery
phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population
growth.

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail
centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer
supply chains. This limits opportunities for strengthening local food economies.
It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for ‘local affordable food’ outlined in SP5.

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach.”

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to
consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and

Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: “Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food
infrastructure within walking distance of new residential areas.” This addresses diet related health inequalities, encourages healthier communities and aligns with HIA
guidance.

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply
chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable
agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models.

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses - to include the following wording: “Rural diversification proposals that support agro-ecological farming, sustainable local food production,
community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations.”

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel
Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022
01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing
flooding and making use more comfortable during hot weather (such as shading from trees). We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

SP13 Community infrastructure and planning obligations:

We want to take this opportunity to highlight the challenges that population growth places on healthcare
services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure. Please refer to the information provided as part of the background evidence paper titled 'BP37
Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within
existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new
developments to take forward its strategic objectives.

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space Assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres. Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.”
There is no reference to the expectation that local communities are consulted in relation to the development of community facilities. We would like to see a
requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and
challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities
that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales’ push for local supply resilience, this is a major opportunity gap. Consider including the following wording:

“Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that

support local and regional food supply chains." This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or
urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: "Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing."

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food
production, short supply chains or sustainable farming practices.
Consider including the following wording: "Development proposals should encourage short supply chains, low-carbon farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives."

Change suggested by respondent:

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: "Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food
infrastructure within walking distance of new residential areas." This addresses diet related health inequalities, encourages healthier communities and aligns with HIA
guidance.

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

5368 Object

Document Element: SP13 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS
Respondent: Ms Lucie Taylor [2506]

Summary:
There needs to be more weight given to the different types of food growing spaces that can be provided in association with new development - large or small, commensurate to the size of development.
We need to move away from the view we should ask for growing spaces only on larger housing sites. Community allotments are fine but we also need smaller blank canvass spaces for food growing that communities can take ownership of. These are not capital intensive asks. We need to raise awareness of the different types of food growing spaces that can be provided.

Full text:
SP13 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS
Preferred wording -
The Council will look to secure high quality secure new and improved community infrastructure, facilities, and services appropriate and commensurate to the scale, type, and location of proposed developments using planning obligations. Viability of site delivery will be a material consideration. Community infrastructure may include the provision, improvement and long-term maintenance of:
• Community growing spaces of different types and scales commensurate to the scale and type of development. such as allotments
6.230 The preferred approach will always be for developers to provide facilities and infrastructure on site to serve the future occupiers of the development.

Change suggested by respondent:
As above

Sound: No
Attachments: None

5674 Support

Document Element: SP13 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS
Respondent: Mr David Entwistle [3264]

Summary:
I support these points but the council needs to work better to actually action their own plans.

Full text:
I support these points but the council needs to work better to actually action their own plans.

Change suggested by respondent:
-

Sound: Not specified
Attachments: None

5859 Support

Document Element: SP13 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS
Respondent: Mr Jeff Smith [3399]

Summary:
Delivery of new or improved infrastructure must be undertaken in a timely and coordinated manner to meet the needs of existing and planned communities *prior to* the commencement of any development.

Full text:
Delivery of new or improved infrastructure must be undertaken in a timely and coordinated manner to meet the needs of existing and planned communities *prior to* the commencement of any development.

Change suggested by respondent:
-

Sound: Not specified
Attachments: None

5914 Comment

Document Element: SP13 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS

Respondent: HBF (Mr Mark Harris) [538]

Summary:

The requirement to provide welsh language facilities is considered onerous. How would a developer provide Welsh language facilities as part of a development? What would this mean in practice, and for how long would they be required? The HBF suggests that a contribution towards Welsh Language improvements would be more appropriate, and would allow for an instance, a financial contribution to support existing facilities. Such an approach is common across other LDPs.

In terms of the Welsh Language, the Council's Background paper BP30 concludes:
'The evidence presented in this background paper demonstrates that the Welsh language, while an important part of Wales's cultural heritage, does not hold a position of significant cultural prominence within the Vale of Glamorgan and that the RLDP is unlikely to materially influence the status, use or vitality of the Welsh language within the area.'

This would suggest that the requirements of the plan should not be overly onerous.

Concerning employment opportunities, the use of the phrase 'complementary facilities' is very vague. With regard to the example of the provision of training and working hubs, it is unlikely to be achievable on the scale of the developments proposed in the plan. A contribution towards such facilities in the wider area is likely to be more achievable, helping support existing facilities, rather than creating more that last only for the length of the development.

Mitigation of Severn Estuary Recreational Pressure: It would be helpful in the supporting text to reference Policy DNP8 – SEVERN ESTUARY RECREATIONAL PRESSURE. Is there any information available on how this will be calculated?

Full text:

The HBF questions the following items in the list:
- Welsh language facilities
- Employment opportunities and complementary facilities, including training and working hubs.
- Mitigation of Severn Estuary Recreational Pressure.

The requirement to provide welsh language facilities is considered onerous. How would a developer provide Welsh language facilities as part of a development? What would this mean in practice, and for how long would they be required? The HBF suggests that a contribution towards Welsh Language improvements would be more appropriate, and would allow for an instance, a financial contribution to support existing facilities. Such an approach is common across other LDPs.

In terms of the Welsh Language, the Council's Background paper BP30 concludes:
'The evidence presented in this background paper demonstrates that the Welsh language, while an important part of Wales's cultural heritage, does not hold a position of significant cultural prominence within the Vale of Glamorgan and that the RLDP is unlikely to materially influence the status, use or vitality of the Welsh language within the area.'

This would suggest that the requirements of the plan should not be overly onerous.

Concerning employment opportunities, the use of the phrase 'complementary facilities' is very vague. With regard to the example of the provision of training and working hubs, it is unlikely to be achievable on the scale of the developments proposed in the plan. A contribution towards such facilities in the wider area is likely to be more achievable, helping support existing facilities, rather than creating more that last only for the length of the development.

Mitigation of Severn Estuary Recreational Pressure: It would be helpful in the supporting text to reference Policy DNP8 – SEVERN ESTUARY RECREATIONAL PRESSURE. Is there any information available on how this will be calculated?

The following wording: 'The delivery of new or improved infrastructure must be undertaken in a timely and coordinated manner to meet the needs of existing and planned communities prior to, or from the commencement of, the relevant phases of development.'
Should be reworded to say that the timing of delivery will be discussed and agreed with developers on a site-by-site basis, with a preference for its delivery as early as possible.

Change suggested by respondent:

The following wording: 'The delivery of new or improved infrastructure must be undertaken in a timely and coordinated manner to meet the needs of existing and planned communities prior to, or from the commencement of, the relevant phases of development.'
Should be reworded to say that the timing of delivery will be discussed and agreed with developers on a site-by-site basis, with a preference for its delivery as early as possible.

Sound: Not specified

Attachments: None

6032 Support

Document Element: SP13 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS

Respondent: Barratt Redrow Homes [2669]

Agent: Lichfields

Summary:

The inclusion of the allowance for development viability in Policy SP13 is endorsed. It is vital that the Council take account of development viability when considering community infrastructure and planning obligations. To not do so, could jeopardise whole allocations which would undermine the delivery of much needed affordable and market housing in VoG. With regards to Affordable Housing Led Allocations, care needs to be taken to ensure that any additional planning obligations beyond the affordable housing are carefully considered in terms of overall viability.

As drafted, Policy SP13 is consistent with PPW and meets the three tests of soundness.

Full text:

The inclusion of the allowance for development viability in Policy SP13 is endorsed. It is vital that the Council take account of development viability when considering community infrastructure and planning obligations. To not do so, could jeopardise whole allocations which would undermine the delivery of much needed affordable and market housing in VoG. With regards to Affordable Housing Led Allocations, care needs to be taken to ensure that any additional planning obligations beyond the affordable housing are carefully considered in terms of overall viability.

As drafted, Policy SP13 is consistent with PPW paragraph 4.2.21 which states that: “Where new housing is to be proposed, development plans must include policies to make clear that developers will be expected to provide community benefits which are reasonably related
in scale and location to the development. In doing so, such policies should also take account of the economic viability of sites and ensure that the provision of community benefits would not be unrealistic or unreasonably impact on a site’s delivery.” Also, with paragraph 4.2.32 of PPW which states that: “When setting the affordable housing thresholds and/or site-specific targets planning authorities must consider their impact on site viability to ensure residential sites remain deliverable.”

Thus, as drafted Policy SP13 meets the three tests of soundness.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6077 Support

Document Element: SP13 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS

Respondent: Barratt Redrow Homes [2669]

Agent: Lichfields

Summary:

The inclusion of development viability considerations in Policy SP13 is endorsed. The need to balance additional planning obligations with overall viability is essential to prevent jeopardising housing delivery. Policy SP13 aligns with PPW guidelines, ensuring that community benefits are reasonably related to developments and do not compromise site deliverability. It is considered that Policy SP13 as drafted meets the three tests of soundness and supports the delivery of affordable and market housing in VoG.

Full text:

The inclusion of the allowance for development viability in Policy SP13 is endorsed. It is vital that the Council take account of development viability when considering community infrastructure and planning obligations. To not do so, could jeopardise whole allocations which would undermine the delivery of much needed affordable and market housing in VoG. Care needs to be taken to ensure that any additional planning obligations beyond the affordable housing are carefully considered in terms of overall viability.

As drafted, Policy SP13 is consistent with PPW paragraph 4.2.21 which states that: “Where new housing is to be proposed, development plans must include policies to make clear that developers will be expected to provide community benefits34 which are reasonably related in scale and location to the development. In doing so, such policies should also take account of the economic viability of sites and ensure that the provision of community benefits would not be unrealistic or unreasonably impact on a site’s delivery.” Also, with paragraph 4.2.32 of PPW which states that: “When setting the affordable housing thresholds and/or site-specific targets planning authorities must consider their impact on site viability to ensure residential sites remain deliverable.”

Thus, as drafted Policy SP13 meets the three tests of soundness.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6138 Object

Document Element: SP13 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS

Respondent: Ms Lucie Taylor [2506]

Summary:

SF&G disagree with the current wording that begins with 'where appropriate and having regard to viability,' as it invites developers to argue this does not apply to their site. We suggest changing it to state that the Council aims to secure high-quality community infrastructure, facilities, and services appropriate to the development's scale, type, and location with site viability a consideration. Community growing spaces should be provided, and references to allotments should be deleted, encouraging developers to create spaces of appropriate size with minimal capital costs (enabling 'community ownership'). The preferred approach remains on-site provision of facilities and infrastructure.

Full text:

Social Farms & Gardens do not agree with the apporach to start with ' where appropriate and having regard to viability. this is an invitation for developers to argue this policy does not apply to their site. please change wording to - The Council will look to secure high quality new and improved community infrastructure, facilities, and services appropriate and commensurate to the scale, type, and location of proposed developments using planning obligations. Viability of site delivery will be a material consideration. Community infrastructure may include the provision, improvement and long-term maintenance of...
• Community growing spaces of different types and scales commensurate to the scale and type of development.

delete reference to allotments. this should not be the go to type of food growing because developers will argue viability and that their site is too small etc. we want to ensure developers are encouraged to provide growing spaces commensurate to the size of development and in many cases this does not involve large capital outlays. blanker canvasses allow communities to take 'ownership' of the space.
6.230 The preferred approach will always be for developers to provide facilities and infrastructure on site to serve the future occupiers of the development. on site provision should always be the preferred option.

Change suggested by respondent:

include text that suggests provision of food growing facilities commensurate to the size and nature of development. large capital outlays are not always necessary to enable community ownership of spaces next to their homes.

Sound: No

Attachments: None

6586 Object

Document Element: SP13 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS

Respondent: Councillor Stephen Haines [1029]

Summary:

Policy SP13 refers to securing infrastructure through planning obligations. However, reliance on financial contributions alone does not ensure timely delivery.

There is insufficient clarity regarding:
- Education capacity expansion.
- Primary healthcare provision.
- Highway mitigation triggers.
- Public transport enhancement sequencing.

Infrastructure must be delivered ahead of, or in tandem with, housing occupation - not retrospectively.

Full text:

1. Section of Plan to which this Representation Relates
- Sustainable Growth Strategy
- Key Housing Sites:
KS4 - Land at Church Farm, St. Athan (532 dwellings) KS5 - Land to the West of St. Athan (600 dwellings)
- Housing Allocations: HG1(7)
Former Stadium Site, adjacent to Burley Place (80 dwellings)
HG1(8) - Clive Road, St. Athan (51 dwellings)
- Transport Policy (TR)
- Community Infrastructure Policy (CI)
- Policy SP13 - Infrastructure Provision
- Green Infrastructure Policies

2. Summary of Representation
This representation raises concerns regarding:
1. The scale of housing growth in St. Athan.
2. The absence of guaranteed sustainable transport infrastructure.

3. Insufficient retail and community infrastructure provision, particularly within the ward of Flemingston.
4. The allocation of the Clive Road site (HG1(8)), which currently functions as a de facto village green.
5. The cumulative infrastructure impact of candidate and legacy site allocations.
The representation seeks modifications to ensure the Plan is infrastructure-led, deliverable, and compliant with national planning policy and the Well-being of Future Generations (Wales) Act 2015.

3. Scale of Housing Growth in St. Athan
The RLDP allocates:
- KS4 - 532 dwellings
- KS5 - 600 dwellings
- HG1(7) - 80 dwellings
- HG1(8) - 51 dwellings
This equates to 1,263 dwellings in St. Athan.
This represents a very significant expansion of the settlement and must be assessed against:
- Existing infrastructure capacity
- Transport provision
- Education and healthcare availability
- Retail and service provision
At present, St. Athan does not have a rail station and relies heavily on private car travel.
The Plan must demonstrate clearly that this level of growth is proportionate and deliverable.

4. Transport Infrastructure and Deliverability
The RLDP safeguards land for a "transport interchange" at St. Athan. However:
- There is no confirmed rail station.
- There is no confirmed funding package.
- There is no defined delivery programme.
- There are no binding occupation triggers linking housing delivery to transport delivery.

Previous references in planning documents referred to a railway station. The revised terminology of "transport interchange" reflects uncertainty.

Under Future Wales - The National Plan 2040, growth within the South East National Growth Area should align with sustainable transport infrastructure. Without guaranteed rail provision, development risks being car-dependent and inconsistent with decarbonisation objectives.

This raises concerns under the soundness test: Will the plan deliver?

5. Retail and Local Service Provision - Flemingston Ward

The Deposit RLDP does not allocate new retail units or local service provision within the ward of Flemingston.
Given the scale of proposed housing growth across St. Athan and its surrounding areas, there is:

- No corresponding neighbourhood retail allocation.
- No clear commitment to small-scale convenience retail within walking distance of new development.
- No spatial recognition of Flemingston's service deficit.

This is inconsistent with Planning Policy Wales placemaking principles, which require:

- Mixed-use neighbourhoods.
- Walkable access to daily services.
- Reduced reliance on private vehicles.

Without provision of much-needed retail units within Flemingston ward, residents will remain dependent on car travel for everyday needs.
Modification is therefore sought to require neighbourhood retail and service provision proportionate to housing growth.

6. Clive Road Site (HG1(8)) - Community Function

The Clive Road site (HG1(8), 51 dwellings) currently functions as a de facto village green.
Although not formally designated, it is:
- Used informally for recreation.
- A visual open space within the settlement.
- A valued community amenity.
Its allocation for housing would result in:
- Loss of accessible informal open space.
- Erosion of community character.
- Reduction in green infrastructure connectivity.
The Plan should:

- Reassess the allocation in light of its community use; or
- Require equivalent or superior replacement open space within immediate proximity prior to development.
This matter engages Policy on Open Space and Green Infrastructure and must be considered in accordance with the prevention and long-term principles of the Well- being Act.

7. Candidate and Legacy Sites - Cumulative Impact Several allocations in St. Athan arise from:
- The Candidate Site process.
- Rolled-forward legacy allocations.
Individually, smaller sites may appear acceptable. However, cumulatively they produce substantial growth in a settlement with constrained infrastructure.
The Plan must demonstrate:
- Why these sites were preferred over alternatives.
- That lower growth options were robustly assessed.
- That greenfield loss is justified and mitigated.

8. Infrastructure and Phasing Concerns
Policy SP13 refers to securing infrastructure through planning obligations. However, reliance on financial contributions alone does not ensure timely delivery.

There is insufficient clarity regarding:
- Education capacity expansion.
- Primary healthcare provision.
- Highway mitigation triggers.
- Public transport enhancement sequencing.

Infrastructure must be delivered ahead of, or in tandem with, housing occupation - not retrospectively.

9. Compliance with the Five Ways of Working

Long-Term: Irreversible greenfield expansion without secured sustainable transport risks embedding long-term car dependency.
Prevention: Without infrastructure-first sequencing, congestion and service strain are foreseeable.
Integration: Housing growth appears to run ahead of confirmed transport and retail provision.
Collaboration: The Plan should demonstrate binding commitments from transport and infrastructure partners.
Involvement: Community concerns regarding scale and open space loss must be properly addressed.

10. Modifications Sought

To ensure soundness and compliance with national policy, the following modifications are requested:

1. Phasing Policy for KS4 and KS5
Introduce clear occupation thresholds tied to delivery of:
- Transport interchange infrastructure.
- Highway mitigation.Education capacity.
- Healthcare provision.

2. Retail Provision Requirement
Require neighbourhood retail and service provision within the ward of Flemingston proportionate to allocated and previous housing growth.

3. Clive Road Site Review (HG1(8))
Either:
- Remove the allocation; or
- Require replacement open space of equal or greater quality delivered prior to development.

4. Strengthened Infrastructure-First Wording
Amend Policy SP13 to make infrastructure delivery a pre-condition, not solely a contribution mechanism.

5. Monitoring Framework Enhancement Include specific indicators for:
- Sustainable transport modal share.
- Retail provision delivery.
- Open space replacement.
- Infrastructure phasing compliance.

11. Conclusion

St. Athan has a role within the wider Cardiff Capital Region and the South East National Growth Area. However, the current scale of housing allocation is not sufficiently matched by guaranteed infrastructure, retail provision, or

community space protection.

Without modification, the Plan risks:
- Car-dependent growth,
- Loss of valued open space,
- Insufficient local retail provision,
- Pressure on community infrastructure.

This representation therefore seeks amendments to ensure that growth in St. Athan and Flemingston is proportionate, infrastructure-led, environmentally responsible, and compliant with Welsh planning policy.

Change suggested by respondent:

Amend Policy SP13 to make infrastructure delivery a pre-condition, not solely a contribution mechanism.

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3tk

6727 Comment

Document Element: SP13 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS

Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

SP13 Community infrastructure and planning obligations: We want to take this opportunity to highlight the challenges that population growth places on healthcare
services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure.

Please refer to the information provided as part of the background evidence paper titled 'BP37 Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new developments to take forward its strategic objectives.

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning
guidance (SPG) proposed. We are keen to ensure that these SPG's are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are
involved in the development of some of these. The content and application of the SPG's will be fundamental to the effectiveness of several of the policies identified in the
deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community
amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient
communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: "The Local Development Plan will support resilient and sustainable
local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part
of sustainable growth."

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and

wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local
diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

“Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other
opportunities for local food production as part of multifunctional green infrastructure.”

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their
proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative
impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

6.54 We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live
full, productive and prosperous lives.'

6.60 We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid
HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to
ensure Developers submit a quality HIA and implement the conclusions.

6.61 Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

6.62 Wales Health Impact Assessment Support Unit has recently released guidance on HIA - see https://phwwhocc.co.uk/whiasu/ for more information and toolkits to ensure most up to date is in use.

6.63 Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the community..'.

6.65 Suggestion to change wording from 'encouraged' to 'expected' for example:
Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement
for HIA will assist with this expectation.

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference “enhancements to leisure, sport and recreation spaces”. Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation. It is recommended that the Key Site schedules include minimum on-site provision standards and delivery
phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population
growth.

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail
centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer
supply chains. This limits opportunities for strengthening local food economies.
It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for ‘local affordable food’ outlined in SP5.

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach.”

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to
consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a

commitment within the Cardiff and Vale Good Food and
Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: “Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food
infrastructure within walking distance of new residential areas.” This addresses diet related health inequalities, encourages healthier communities and aligns with HIA
guidance.

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply
chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable
agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models.

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses - to include the following wording: “Rural diversification proposals that support agro-ecological farming, sustainable local food production,
community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations.”

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel
Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022
01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing
flooding and making use more comfortable during hot weather (such as shading from trees). We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

SP13 Community infrastructure and planning obligations:

We want to take this opportunity to highlight the challenges that population growth places on healthcare
services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure. Please refer to the information provided as part of the background evidence paper titled 'BP37
Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within
existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new
developments to take forward its strategic objectives.

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space Assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres. Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.”
There is no reference to the expectation that local communities are consulted in relation to the development of community facilities. We would like to see a
requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and
challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities
that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales’ push for local supply resilience, this is a major opportunity gap. Consider including the following wording:

"Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains." This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or
urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: "Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing."

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food
production, short supply chains or sustainable farming practices.
Consider including the following wording: "Development proposals should encourage short supply chains, low-carbon farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives."

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

6786 Object

Document Element: SP13 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS
Respondent: Persimmon Homes (East Wales) [1068]
Agent: Boyer Planning

Summary:

Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth

are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:

1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.
Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth

over the emerging plan period.
In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new

dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.

For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.

In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).

In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.

Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement

From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.

As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.

Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.

Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.

Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.

Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.

In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

Policy SP2 – Settlement Hierarchy

In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.

Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.

Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.

Policy SSC1 – Development within Settlement Boundaries

Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.

Policy SP4 – Placemaking

In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.
In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car.
Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.
The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.
Policy PGD1 – Creating Well Designed and Inclusive Places
Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.
On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.

The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity

Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.

Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.

As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.

The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.

Loss of Allocated Employment Land

Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.

Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.

By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)

Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.

According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.

On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.

Policy HG3 – Housing Led Redevelopment Opportunity

Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion

within housing completions for monitoring purposes.
Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
Policy SP7 – Affordable Housing Provision
In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
Policy SP8 – Affordable Housing Requirements
Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.
Policy SP10 – Sustainable Transport
Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.
In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
Policy TR1 – Transport Proposals
Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport

infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.

In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.

Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.

Policy SP13 – Community Infrastructure and Planning Obligations

Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.

Policy CI1 – Open Space Provision

Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.

The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.

Productive and Enterprising Places

Policy CC1 – Residential Operational Net Zero Carbon Development

Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.

Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.

Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.

The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.

Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.

Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For

these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.

Distinctive and Natural Places

Policy SP19 – Green Infrastructure

In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.

For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.

The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.

Policy SP20 – Biodiversity and Ecosystem Resilience

In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Policy DNP1 – Special Landscape Areas

Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.

Policy DNP2 – Green Wedges

Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.

Policy DNP8 – Severn Estuary Recreational Pressure

Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.

The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.

From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.

Conclusion

Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes' most pertinent comments on the consultation document are summarised below:

• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.

• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/38r

6919 Object

Document Element: SP13 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS
Respondent: Barratt Redrow Homes [2669]
Agent: Boyer Planning

Summary:

Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.

Full text:

1. INTRODUCTION
1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.
1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:
• Section 3 – The Vale of Glamorgan Key Characteristics;
• Section 4 – RLDP Key Themes, Vision, and Objectives;
• Section 5 – Sustainable Growth Strategy; and
• Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.
1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS
Settlement Pattern
2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.
2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Need
2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
3. RLDP KEY THEMES, VISION, AND OBJECTIVES
3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.
Key Themes
3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY
Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by

existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
5.10 For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
5.11 More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
5.12 Whilst Barratt Redrow appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range, having reviewed the Deposit Plan evidence base Barratt Redrow believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
5.13 In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
5.14 Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
5.15 In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
5.16 In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need. Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP

more effectively meet local need over the entire plan period and thus soundly prepared.
5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036) and therefore is made up of

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.
5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.
5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.
5.27 In summary, Barratt Redrow acknowledge the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
5.28 These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance and additional site allocations, such as Swn Y Coed, Wenvoe, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
5.29 Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.

5.30 Accordingly, despite Wenvoe being identified as a primary settlement, Policy SP2 notes that development in this location will be limited to 'the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.' Similarly, it is noted that Policy SP2 does not consider Wenvoe to be an appropriate location for ''substantial additional growth''.
5.31 Barratt Redrow object to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified.
5.32 First of all, the Deposit Plan acknowledges that it performs a similar function to the Primary Settlements located within the Strategic Growth Area and it is described as one of the 'sustainable communities' in The Vale of Glamorgan Key Characteristics section, as noted previously in Section 3.
5.33 Likewise, the site benefits from excellent accessibility the local public transport network, active travel routes and local services. These characteristics fully accord with Welsh Government's strategic objectives and emphasise the fact that Swn Y Coed constitutes an appropriate location for future housing.
5.34 With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge''. Barratt Redrow do not consider this to be sufficient justification to discount the site from allocation as there would be limited impact on BMW agricultural land arising from the development of Swn Y Coed.

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available.
5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.
Policy SP4 - Placemaking
5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.
5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.
5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.
5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.
5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
Policy PGD1 – Creating Well Designed and Inclusive Places
5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base

reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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Unsustainable Location & Poor Connectivity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with

both local and national planning policy objectives.
• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.
• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.
• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.
• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.
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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
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• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and

more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply
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• HG1 (8) St Athan - Clive Road, St Athan

Policy HG3 – Housing Led Redevelopment Opportunity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls,

raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).
• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4).Finally, the Council's own Viability Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.
• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.
• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:
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Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:
i. Space heating demand less than or equal to 40kWh/m2/year;
ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.
• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.

• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
•

Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established 'defensible' limit to development. The topography connects with the main settlement to the extent

that any new development would appear well connected to the existing settlement, physically and visually. This is a similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be 'largely shielded from view by woodland blocks/strips'.
• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for 'infilling' the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.
• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
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Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
•

Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral

resource safeguarding area.
• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
•

MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
•
• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
•
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
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CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the Council's vision for the VoG.
• 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
• 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
•

6. CONCLUSION
• Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.
• Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swn Y Coed, are necessary to ensure the RLDP is able to effectively meet
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Barratt Redrow welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Barratt Redrow support the requirements for affordable housing in new development. In its current form the proposed policies SP7 and SP8 lack sufficient flexibility for site specific circumstances and physical constraints which may impact upon delivery. This inevitably creates uncertainty for a number of sites, where the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities.
• From a planning perspective it is also important to recognise the additional benefits the site (Candidate Site Ref No. 437) could provide in accommodating the increased housing need generated by the suggested 15% flexibility allowance within a highly sustainable location. The principles of which clearly align with the Council's aspirations and would maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3ch

6967 Comment

Document Element: SP13 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.

Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.

The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037

Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.

Settlement boundaries

SSC1 – development within settlement boundaries

We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).

Housing delivery

HG1 - housing allocations

A. Key sites (Policy HG1 KS1-5)

Our representation on the above sites are included in appendix 1.

B. Housing allocations (HG1 (1) to HG1 (9))

Our representation on the above sites are included in appendix 1.

C. Major landbank sites (HG2 (1) to HG2 (5))

These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.

D. Housing led redevelopment opportunity (HG3 (1))

Our representation on the above site is included in appendix 1.

E. Rural affordable housing led sites (HG4 (1) to HG4(4))

Our representations on the above sites are included in appendix 1.

Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.

Gypsy and traveller accommodation (GT)

SP9 - gypsy and traveller site provision

Our representation on the site allocation is included in appendix 1.

Retail, commercial and service centres (RCS)

SP12 - retail floorspace provision

Our representations on the site allocations are included in appendix 2.

Community infrastructure (CI)

SP13 - community infrastructure and planning obligations

We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.

Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
Our representations on the site allocations are included in appendix 2.
We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the 'domestic' supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.
Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site
Our representations on site allocations are provided in the table below. The following caveats are applicable to all sites:
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion.
• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a

Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
The following provisions are applicable to all allocated employment sites:
• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
• Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcements.
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

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Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

7109 Support

Document Element: SP13 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS
Respondent: Barratt Redrow Homes [2669]
Agent: Turley

Summary:

We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.

Full text:

Policy SP1 - Sustainable Growth Strategy
Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP

seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.
It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.
In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"
Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be concentrated is supported.

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The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable. As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Policy SP4 - Placemaking
We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.
The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses... ' or to be developed at 'high densities... and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.
Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

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There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

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This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites

constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any

improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail

floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy Cll - Open Space Provision
The wording of Policy Cll, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy Cll should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy Cll requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been

undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7110 Comment

Document Element: SP13 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS

Respondent: Barratt Redrow Homes [2669]

Agent: Turley

Summary:

It must be recognised in the policy or supporting text that the delivery/timing of some infrastructure measures will be outside the control of developers/developments. This is particularly the case where financial contributions are made, and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Full text:

Policy SP1 - Sustainable Growth Strategy

Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.

The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.

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(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
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The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved

through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy CII - Open Space Provision
The wording of Policy CII, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy CII should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy CII requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7195 Support

Document Element: SP13 - COMMUNITY INFRASTRUCTURE AND PLANNING OBLIGATIONS

Respondent: H Jones, L Sungur and P John [3741]

Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

Policy SP13 demonstrates the importance of community infrastructure in sustaining both the residents well being and economic growth of an area. To see in Policy SP13 that ‘development viability’ is recognised as a key factor in delivering community infrastructure under planning obligations, is supported.

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis. Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

The inclusion of the site within the settlement boundary is logical especially when viewed in the context of the linear settlement of Fferm Goch. In addition the site is further suited to development allocation as the northern and southern boundaries are built up and the main road runs along the eastern boundary. A flexible approach is encouraged with regard to the delivery of the dwellings in relation to a variety of factors and policy provisions including the housing needs across the Vale, the limit on numbers of rural affordable led sites in minor rural settlements, viability implications relating to obligations/carbon Zero and sustainability obligations and the potential to extend the allocation if the need for homes requires.

The 3 land owners remain committed to this development and local developers are waiting to deliver the allocation.

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

The test of soundness for a Local Development Plan (LDP) is a critical component of the planning process to ensure that the plan is prepared in accordance with legal and procedural
requirements. It involves demonstrating that the plan is 'sound' based on three tests set out by the Welsh Government in the Development Plans Manual (Edition 3). These tests have therefore been considered in our representation, the tests include:

• Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)
• Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
• Test 3: Will the plan deliver (i.e. is it likely to be effective?)

SP1 – Sustainable Growth Strategy

The promotion of small scale affordable housing led development outside of the SGA, as proposed by SP1 is important as this provides essential affordable and market homes in the rural locations of the Vale as well as the SGA. Their provision is critical in meeting the area's housing needs, particularly affordable dwellings and supporting rural community stability, and ensuring that all parts of the Vale remain a place where people of all incomes are able to live and thrive during the plan period to 2036 and beyond.

The essence of Policy SP1 is supported, however it is well documented that there is a backlog in delivery of affordable homes and the need for affordable housing in the Vale is exacerbated by the high prevalence of single person households plus households comprising couples with no children, The Vale also has one of the highest affordability pressures in Wales. As stated in the 2023 Local Housing Market Assessment (LHMA) for the Vale of Glamorgan , the median house price in the Vale is around 8 times the median household income, well above the affordability threshold of 4.5 to 5 times household income for borrowing purposes. Private rents have also risen sharply in the area, commonly placing them out of reach for many low-to-middle income households. All of the above place further pressure on the need to deliver affordable homes in the locality.

The LHMA identifies a need for 1,075 affordable homes per year over the next 5 years based on principal projections (or 1,114 based on the RLDP projections). As mentioned previously past delivery rates fall significantly short and therefore a backlog is present, however despite the reported backlog the RLDP only proposes 3,070 (205/annum) affordable dwellings over the plan period to 2036. Despite the growth strategy of policy SP1 and allocations made through the RLDP, the figure of proposed affordable dwelling numbers is concerning as it falls significantly short of the demand evidenced within the most recent evidence of LHMA of 2023.

The housing figures quoted in SP1 indicate 7,890 dwellings (including the 3,070 affordable dwellings) to 2036, however these figures overall are inadequate over the plan period when considered against the 2022 WG household projections. The 2022-based household projections provide an indication of the future number of households, and their composition, based on population projections and assumptions about households from recent censuses. The vale of Glamorgan demonstrates an increase of almost 12% in the number of households between mid-2022 and mid-2032; note this is the highest percentage increase by Local authority in Wales and way above the average for Wales as a whole (that stands at around 7% increase). The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both open market, but particularly Affordable) development across the Vale.

Without targeted allocations outside of the SGA, as outlined in Policy SP1, the gap described above will continue to

widen, forcing more residents to leave the area and weakening community cohesion.

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the RLDP the supporting text of Policy SP2 states:
'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

sustainable growth. Locating affordable-led developments in areas with existing infrastructure such as primary schools will reduce car dependency, lower carbon emissions, and contribute to the Council's climate change commitments.

Considering the above, the limit on small scale rural affordable housing led developments (RAHLD) to 25 for these settlements is questioned and further flexibility recommended on a case by case basis. It is understood the limit on numbers was imposed due to the existing scale of the settlement in which the RAHLD are located, however those allocations will only likely deliver at 50% affordable and therefore only provide 12.5 (or 13) affordable units as a maximum (note Fferm Goch would provide 11 affordable dwellings on current figures of 22 total dwellings). Given the concerns raised in response to Policy SP1 there remains an issue of whether the numbers proposed in the RLDP can meet the demonstrable need for affordable homes and if there is scope on a RAHLD to sensitively increase unit numbers without any material harm then the policy should be flexible to accommodate this.

Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the range of facilities and services provided in these settlements. It is also supported that these settlements are able to provide affordable led residential development of up to 50 dwellings (delivering 25 affordable units). However the provision of an increased number of units in the Primary Non SGA settlements must not be at the expense of a wider number of smaller rural sites with the ability to sustain smaller communities across the Vale, especially given the shortfall in numbers as outlined above.

PGD2 – Residential Development Densities

The best use of finite land is set out in PPW and consistent with the setting of the densities as prescribed in policy PGD2. The policy is considered to meet the 3 tests of soundness.

The approach of policy PGD2 is also supported through the proposed density of the site North of Westwinds business park, Fferm Goch in HG4 (4). This allocation that proposes to provide a density of just over 30/ha within Fferm Goch, a minor rural settlement.

SP6 – Housing Requirement

Affordable housing forms an important part of the housing requirement figures of Policy SP6. Whilst the total 122 dwellings proposed under policy HG4 is a relatively small contribution to the overall figures it provides important spatial distribution of homes across the Vale within the rural area.

Given the concerns raised with regard to Policy SP1 there is fear that the affordable housing numbers will not be sufficient to meet need. The site north of Westwinds business park, Fferm Goch has the ability to expand to the south (as per the CS Ref 398) in order to accommodate additional dwellings (both market and affordable dwellings in order to sustain the viability of the site).

SP7 – Affordable Housing Provision

In accordance with Policy SP7 the allocated site HG4(4) at Fferm Goch provides a range of tenures, types and sizes in response to the LHMA, waiting list data and Older persons housing strategy in order to provide for 11 dwelling units and contributing toward the 3,070 affordable requirement to 2036. Changes in the household composition mean more single person and small homes are required, plus older person accommodation for those wishing to downsize and stay in the area.

Please see comments for Policy SP1 / Policy SP2 above regards concern over the proposed housing numbers and

supply of affordable homes against demand - this therefore brings the Deliverability of the plan in to question (Test of Soundness 3).

SP8 – Affordable Housing Requirements

Policy SP8 is supported in so far as contributing much needed affordable housing development commensurate with the size of the settlement in which it sits. We are encourage to see reference to the provision of affordable housing to be negotiated on a site by site basis considering evidenced viability fo the development.

The affordable dwellings proposed foster stability in rural areas by allowing a range of households (from single person to growing families) to stay in their local area.

Policy SP8 states 40% affordable for those developments in primary and minor settlements outside of the SGA yet 50% requirement on affordable housing led allocations in minor rural settlements (also outside of the SGA). This appears inconsistent and penalising those smaller rural sites that will already be more delicately balanced in viability terms by virtue of their limited size of 25 units. Further viability issues covered in other policies (such as SP20, relating to biodiversity, Net Zero and sustainability credentials must (with the required evidence submitted and assessed by the council as stated in Policy SP8) be flexibly reviewed to ensure sites are viable and deliverable as recognised by the Council, there is a danger the stringent requirements, especially for smaller sites, could render those sites unviable in the current climate with rising build costs.

HG4 – Rural affordable housing led sites

The allocation of land north of West Winds Business Park under policy HG4(4) for rural affordable housing led development of 22 units is strongly supported. Then allocation will assist in delivering homes in the rural Vale and contribute to the important stability to the settlement of Fferm Goch to 2036.

The extension of the settlement limit including the site north of West Winds Business Park is supported. The site provides an obvious infill to the small break in the built up area to both the north and south of the site, with the main road running to the eastern boundary of the site.

The inclusion of the site within the settlement of Fferm Goch is logical and in harmony with the existing linear settlement.

The proposal supports the aims of the Local Development Plan and the Welsh Government's commitment to increasing affordable housing supply. By providing for affordable led allocations the policy aligns with the Well-being of Future Generations (Wales) Act 2015 in aiming to promote a healthier, more equal, and cohesive community.

There is concern however surrounding the number of dwellings proposed and if the Plan seeks sufficient dwellings and affordable provision given the predicted need to 2036 shown in the LMHA.

SP13 – Community infrastructure and planning obligations

Policy SP13 demonstrates the importance of community infrastructure in sustaining both the residents well being and economic growth of an area. See also the response to Policy SP2 that refers to the allocation of housing in the rural areas specifically supporting those settlements with local primary school provision.

The viability of developments however must not be compromised in order to ensure delivery of the plan. To see in Policy SP13 that 'development viability' is recognised as a key factor in delivering community infrastructure under planning obligations, is supported. It is recommended that this recognition is replicated in other policies of the LDP in order that the third Test of soundness can be fully met; Deliverability – ensuring the plan is likely to be effective). See comments in relation to Policies SP8/CC1/SP16/CI1.

CI1 – Open Space Provision

Provision of open space in residential developments is supported. HG4(4) promotes open space within the draft allocation.

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

The provisions of SP16 are generally supported as practical measures to ensure important sustainable development is achieved.

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

Provision of Green Infrastructure in residential, and all developments is supported.

HG4(4) retains and enhances existing and will promote green infrastructure on the draft allocation.

The viability of developments however must not be compromised through green infrastructure provision - in order to ensure delivery of the plan. The 'development viability' should therefore be recognised as a key factor in delivering Green Infrastructure. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

Fferm Goch is one of the settlements that remains fully within and covered by the Upper and Lower Thaw Valley Special Landscape Area (SLA). It is noted that in such settlements, while there have been amendments to the identified settlement boundary (inclusion of HG4 (4) rural affordable led housing allocation) this has not affected the SLA designation in these areas. (Background Paper 45; Paragraph 1.16 refers).

The location of the small allocated site HG4(4) is nestled within the settlement of Fferm Goch. It is built up on both the northern and southern boundaries, with the main road running along the eastern boundary. There is no unacceptable harm to the SLA of the Upper and Lower Thaw valley.

The allocation of the site for residential development does not give rise to unacceptable harm to the special qualities and characteristics of the SLA, based on LANDMAP information, continues to be preserved.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

5398 Comment

Document Element: CI1 – OPEN SPACE PROVISION

Respondent: Ms Lucie Taylor [2506]

Summary:

I support the policy but suggest refining the wording. It should emphasise that open space must largely be provided on-site, with clear justification required if not possible, and off-site provision should be as close as possible. Financial contributions are a last resort. For other open spaces, provision should be designed locally and respond to needs, with encouragement for community growing spaces, due to their high returns on investment and social benefits, including community cohesion, crime reduction, and social value.

Full text:

Social Farms & Gardens generally supports this policy. However, this wording needs refinement -
Areas of open space will nearly always be required to be provided on-site as part of new development proposals. Where it is not possible to make provision on-site, clear justification will need to be provided and furthermore, appropriate off-site (geographically, as close as possible) provision will then be preferred, and lastly financial contributions will be accepted (in this order of preference) for improvements to existing facilities, in lieu of on-site play, outdoor sports provision or amenity greenspace.

The wording should ask for clear justification of why it is not possible (delete the word practical) to make on site provision. The hierarchy of preference for on site provision needs to be emphasised. Also, the off-site provision should be as close to the development as possible.

Furthermore -
This wording needs refinement -
For other open spaces, which may include outdoor sports provision, formal and informal greenspace and community growing areas, a combined target is identified based on the FIT Standards for other types of open space. On site provision should be design and return led rather than standards led and the type of provision to meet this target must respond to the local context and address identified local needs for specific types of open space, having regard to the findings of the Open Space Background Paper. Different types of community growing spaces commensurate to the size of development will be encouraged this is because of their proven high, per sq m 'return on investment' rates and array of benefits that can be delivered through such provision.

We would like to see more weight given to the provision of community food growing spaces. This is because community growing spaces offer large per square metre, returns on investment and these returns need to be recognised in land use policy terms.
Community gardens can help foster broader community cohesion* cross-cultural understanding** as well as reduce crime***and a 2011 social return on investment study showed that for every £1 invested in community gardens, £3.56 of social value was returned****
*. https://link.springer.com/article/10.1186/s12889-019-71083?utm_source=getftr&utm_medium=getftr&utm_campaign=getftr_pilot
**. https://link.springer.com/chapter/10.1007/978-981-10-4113-6_6
***. https://www.neefusa.org/story/health-and-environment/how-greening-communities-can-reduce-violence-and-promote-health
****. https://socialvalueuk.org/wp-content/uploads/2023/05/GORGIE-CITY-FARM-SROI-As

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5675 Support

Document Element: CI1 – OPEN SPACE PROVISION

Respondent: Mr David Entwistle [3264]

Summary:

I support this provision of open space but think more stipulations should be in place in terms of the form it takes. An open field is fine but open space should also include areas of habitat for native animals and plants and be planned in a way that encourages residents to spend time appreciating and enjoying the viewing of these natural habitats. There should also be a move towards more natural, sustainable green spaces suitable for native wildlife as opposed to very manicured fields and gardens.

Full text:

I support this provision of open space but think more stipulations should be in place in terms of the form it takes. An open field is fine but open space should also include areas of habitat for native animals and plants and be planned in a way that encourages residents to spend time appreciating and enjoying the viewing of these natural habitats. There should also be a move towards more natural, sustainable green spaces suitable for native wildlife as opposed to very manicured fields and gardens.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5862 Object

Document Element: CI1 – OPEN SPACE PROVISION

Respondent: Mr Jeff Smith [3399]

Summary:

Any new development needs additional Allotment space provided and / or remove the coast and countryside parking charges for vale residents.

Full text:

Any new development needs additional Allotment space provided and / or remove the coast and countryside parking charges for vale residents.

Change suggested by respondent:

Any new development needs additional Allotment space provided and / or remove the coast and countryside parking charges for vale residents as without this the amount of accessible green space is restricted

Sound: No

Attachments: None

5950 Object

Document Element: CI1 – OPEN SPACE PROVISION
Respondent: HBF (Mr Mark Harris) [538]

Summary:

The requirement for an 'open space strategy' for all housing development is considered onerous and unnecessary. What guidance exists on what this document should contain, and how would it differ from the submission of a landscape scheme/planning statement/design and access statement, as part of the planning application?

If the requirement is retained, it should be set at a threshold of sites larger than 100 units so as not to cause additional work for SME developers.

Full text:

The requirement for an 'open space strategy' for all housing development is considered onerous and unnecessary. What guidance exists on what this document should contain, and how would it differ from the submission of a landscape scheme/planning statement/design and access statement, as part of the planning application?

If the requirement is retained, it should be set at a threshold of sites larger than 100 units so as not to cause additional work for SME developers.

Change suggested by respondent:

Amend the text accordingly.

Sound: Yes
Attachments: None

6039 Object

Document Element: CI1 – OPEN SPACE PROVISION
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:

The proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with Field in Trust's (FiT's) methodology. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.

Policy CI1 also requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, it is appropriate for the provision of open space within a scheme to be addressed through a Design and Access Statement and / or Green Infrastructure Statement.

Full text:

Policy CI1 sets out that "all new residential development with a net gain of 10 or more dwellings will be required to provide well-designed, accessible useable open space provision in accordance with the following benchmark open space minimum standards per 1000 population:

• 0.55 Ha of play space (12.4m2 per dwelling)
• 2.2 Ha of additional open space including community growing spaces, outdoor sports and informal open space provision (49.8m2 per dwelling)".

The proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with Field in Trust's (FiT's) methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.

Policy CI1 also requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, it is appropriate for the provision of open space within a scheme to be addressed through a Design and Access Statement and / or Green Infrastructure Statement. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity.

Change suggested by respondent:

A standalone Open Space Strategy is therefore not necessary and Policy CI1 should be amended to reflect this. This amendment is necessary to ensure that Policy CI1 meets the second test of soundness (Is the Plan appropriate?).

Sound: No
Attachments: None

6728 Comment

Document Element: CI1 – OPEN SPACE PROVISION

Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning
guidance (SPG) proposed. We are keen to ensure that these SPG's are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are
involved in the development of some of these. The content and application of the SPG's will be fundamental to the effectiveness of several of the policies identified in the
deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community
amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: "The Local Development Plan will support resilient and sustainable
local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part
of sustainable growth."

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local
diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

"Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other
opportunities for local food production as part of multifunctional green infrastructure."

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their
proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative
impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

6.54 We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live
full, productive and prosperous lives.'

6.60 We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid
HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to
ensure Developers submit a quality HIA and implement the conclusions.

6.61 Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

6.62 Wales Health Impact Assessment Support Unit has recently released guidance on HIA - see https://phwwhocc.co.uk/whiasu/ for more information and toolkits to ensure most up to date is in use.

6.63 Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the community..'.

6.65 Suggestion to change wording from 'encouraged' to 'expected' for example:
Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement
for HIA will assist with this expectation.

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference “enhancements to leisure, sport and recreation spaces”. Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation. It is recommended that the Key Site schedules include minimum on-site provision standards and delivery
phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population
growth.

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail
centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer
supply chains. This limits opportunities for strengthening local food economies.
It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for ‘local affordable food’ outlined in SP5.

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach.”

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to
consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and
Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: “Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food
infrastructure within walking distance of new residential areas.” This addresses diet related health inequalities, encourages healthier communities and aligns with HIA
guidance.

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply
chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable
agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models.

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses - to include the following wording: “Rural diversification proposals that support agro-ecological farming, sustainable local food production,
community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations.”

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel
Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022
01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing
flooding and making use more comfortable during hot weather (such as shading from trees). We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

SP13 Community infrastructure and planning obligations:

We want to take this opportunity to highlight the challenges that population growth places on healthcare
services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure. Please refer to the information provided as part of the background evidence paper titled 'BP37
Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within
existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new
developments to take forward its strategic objectives.

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space Assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres. Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.”
There is no reference to the expectation that local communities are consulted in relation to the development of community facilities. We would like to see a
requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and
challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities
that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales’ push for local supply resilience, this is a major opportunity gap. Consider including the following wording:

“Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains.” This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or
urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: “Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing.”

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food
production, short supply chains or sustainable farming practices.
Consider including the following wording: “Development proposals should encourage short supply chains, low-carbon farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives.”

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

6746 Comment

Document Element: CI1 – OPEN SPACE PROVISION
Respondent: Hallam Land Management [854]
Agent: Savills

Summary:

Hallam is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter.

Full text:

1.1. Savills is instructed by Hallam Land ('Hallam') to respond to the consultation on the Deposit version of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').
1.2. Hallam is the strategic land arm of Henry Boot PLC and is one of the UK's most well established and successful land promoters. Hallam operates throughout England, Scotland and Wales from 7 regional offices working with landowners, developers, local authorities, communities and other parties to bring forward development opportunities. Hallam has been in operation since 1990, specialising in obtaining planning permission and delivering development larger schemes including new communities and urban extensions.
Background to Representations
1.3. The Preferred Strategy was published in November 2023. The Preferred Strategy identified "Land West of St Athan" and "Land South of the B4265, St Athan" (Site IDs 456 and 457) as one of five Key Sites in the Preferred Strategy. Both of these sites are under the control of Hallam and were submitted as part of the Call for Sites. A site-specific illustrative masterplan and policy wording were provided under Policy SP4 KS5 (Land to the West of St Athan).
1.4. Hallam submitted representations on the consultation on the Preferred Strategy. These representations were very much supportive of the identification of "Land to the West of St Athan" as a Key Site and the approach that was taken more generally taken in the Preferred Strategy.
Approach to Responding to Consultation
1.5. The VoG has published the Deposit version of the RLDP. The Deposit is the first version of the RLDP to include emerging allocations, and detailed development management policies, as well as a Proposals Map. It is accompanied by a substantial evidence base which includes various supporting technical documentation submitted as part of the promotion of the allocated sites.
1.6. Building upon the Preferred Strategy, the Deposit RLDP proposes to allocate Land to the West of St Athan as a Key Site. The site is identified under Policy HG1 KS5 (Land to the West of St Athan) as key mixed-use site with capacity for 600 new homes alongside new community and commercial facilities.
1.7. Hallam's representation to this consultation broadly splits into three separate sections:
• It offers general support for the housing requirement, growth strategy and settlement hierarchy. This is covered in Chapter 2 of this Statement;
• It wholly supports the approach of allocating Land to the West of St Athan as part of the Deposit RLDP whilst also providing detailed commentary on the specific wording of Policy HG1 KS5 (Land to the West of St Athan). This is covered in Chapter 3 of this Statement; and
• It provides commentary on a range of development management policies. This is covered in Chapters 4, 5, 6, and 7 of this Statement.
1.8. As well as this Statement, Savills has provided commentary on these specific policies under the VoG's consultation website.

Policy SP1 (Sustainable Growth Strategy), Policy SP2 (Settlement Hierarchy), and Policy SP6 (Housing Requirement)
2.1. Together, these policies have the effect of:
• Setting the housing requirement to be delivered over the RLDP plan period of 7,890 homes with a flexibility allowance applied on top so that provision is made for a total of 8,660 homes. This is the same housing requirement to that included in the Preferred Strategy which was found by Welsh Government to be in conformity with Future Wales (Policies SP1 and SP6);
• Identifying the extent of the Strategic Growth Area as the primary focus of new housing growth. Concentrations of new housing are focussed in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity. St Athan is a specifically named settlement within the Strategic Growth Area (Policy SP1); and
• Identifying St Athan as a Primary Settlement in the third tier of the settlement hierarchy. This is the same tier of the settlement hierarchy as St Athan is in the adopted LDP (Policy SP2).
2.2. Hallam are generally supportive of the aims of these three policies.
2.3. They recognise that the housing requirement has been subject to extensive scrutiny and been found to be appropriate by Welsh Government in response to the Preferred Strategy. In that sense, there is nothing further for Hallam Land to comment upon here other than to note that it should reasonably be seen as the minimum number of homes that

the RLDP should be aiming to deliver, particularly following the publication of the 2022-based household projections between Welsh Government's comments on the Preferred strategy and the publication of the Preferred Strategy.
2.4. The strategy – of focussing new housing in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity – is wholly supported. St Athan is clearly already a sustainable location for growth and its sustainability and connectivity have clear potential to enhance alongside further development. The delivery of growth in St Athan is therefore considered to firmly align with the RLDP's strategy.
2.5. The continued positioning of St Athan as a Primary Settlement in the third tier of the settlement hierarchy is considered appropriate though clearly the delivery of two Key Sites within St Athan as part of the RLDP has the potential to further elevate its position in the future. This is reflected in Table 10 of Background Paper 5 Settlement Appraisal Review where St Athan is given one of the higher scores of the Primary settlements.

Policy HG1 KS5 (Land to the West of St Athan)
3.1. Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.
3.2. There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.
3.3. The relevant policy for Land to the West of St Athan is Policy HG1 KS5.
3.4. As a starting point, Hallam wholeheartedly support the allocation of Land to the West of St Athan as a Key Site within the RLDP. Hallam made a comprehensive submission as part of the Call for Sites stage and since then have worked proactively with the VoG and other stakeholders to demonstrate that the site is suitable, deliverable, and viable. It's identification as a Key Site in the Deposit RLDP represents extensive and thorough assessment – its proposed allocated is therefore considered to be sound and firmly evidence based.
3.5. So that the policy functions as effectively as possible, Hallam has a small number of comments and included at Appendix A is a re-worded version of Policy HG1 KS5 which incorporates those changes with text suggested to be removed crossed through and text to be added shown underlined.
3.6. These proposed adjustments are considered in turn below and are structured around the sub-headings that are contained within the policy wording itself.
Site Capacity and Housing Trajectory
3.7. Extensive environmental and technical work has been undertaken by Hallam to support the promotion of the site and the development of a masterplan (and site capacity) that responds to the site's constraints and opportunities.
3.8. That said, Hallam is not a housebuilder and once an outline planning application has progressed, Hallam will identify a development partner (which could be a single or multiple housebuilders / housing associations). Clearly different housebuilders have different house types and differing approaches to density.
3.9. In addition, whilst a lot of technical and environmental work has been undertaken to date, clearly further technical work would be submitted at planning application stage which would further validate the site's capacity.
3.10. Legislative and guidance changes also have the potential to impact a site capacity. Whilst the masterplanning process has been prepared to be SAB compliant, the impact of the introduction of the requirement to secure SAB approval has had an impact on site capacity and it follows that a further, and as yet unknown, legislative or guidance change could have a similar impact.
3.11. This is not to suggest that there isn't a high degree of confidence that the site can deliver roughly 600 homes, rather that Hallam suggest that the word 'approximately' is added to the policy wording to reflect the potential for a degree of deviation (which could be upwards or downwards).
3.12. Background Paper 9A Housing Land Supply and Housing Trajectory sets out the anticipated annual delivery rates for housing over the RLDP. With regards to the ability of the site to deliver the number of homes it is allocated for in the RLDP plan period, the housing trajectory for the site reflects that the first completion date was pushed back from 2027/2028 to 2028/2029 since the consultation on the Preferred Strategy. This means that the whole site continues to be shown as being delivered within the RLDP plan period.
3.13. Hallam support and agree with the approach set out in the Draft Housing Trajectory and see it to be realistic and achievable based on their experience and subject to usual caveats around the condition of the market, RLDP progression, and swift determination of a planning application.
Affordable Housing
3.14. At present, Policy HG1 KS5 (like all of the standalone policies for the other four Key Sites), states that the site should provide a minimum of 210 affordable housing units. This figure is derived from 35% of the number of homes that the site is allocated for (600 homes).
3.15. Worded at present, a strict interpretation of this policy could be that 210 affordable units must be provided onsite regardless of the total number of homes that are proposed. For example, it could be interpreted as requiring a fixed number of affordable homes of 210 homes, even if the total number of homes that are proposed on the site is fewer than the 600 homes that the site is allocated for or, conversely, that only 210 homes should be delivered as affordable if more than 600 homes were to be delivered and the RLDP allocation exceeded.
3.16. Hallam recognise that this is not what the policy wording is seeking to achieve (and their viability work for the site is based on the site delivering 600 homes of which 35% are affordable) but suggest that its wording could be clarified by

removing reference to a specific number of affordable homes for the site to deliver in favour of just the affordable housing percentage being noted in the policy.
3.17. Hallam also suggest that the requirement for affordable housing units to not be in clusters of more than 10 homes is removed and that the approach is for this to be considered on a site by site and case by case basis and with recognition that Policy HG5 (Affordable Housing Exception Sites) which can provide a framework for 100% affordable sites of more than 10 homes to be delivered. As an example, and in the case of Land to the West of St Athan, the "Land South of the B4265, St Athan" (Site ID 457) portion of the site is likely better suited to a mixed-use development alongside the future St Athan Railway Sation. This portion of the site is probably better suited to a flatted form of development (either above non-residential uses or as a block) which tend to be delivered as 100% affordable housing developments rather than comprising a mix of private and affordable housing.
Sustainable Transport and Highways
3.18. This part of the policy sets out expectations relating to sustainable transport and highways and there are a number of matters which Hallam wish to comment on.
3.19. As a starting point, Hallam support the delivery of St Athan Railway Station and therefore commits to its safeguarding. Likewise, Hallam recognise the potential suitability for the "Land Between the Railway Line and B4265, St Athan" (Site ID 458) site to accommodate a Welsh-Medium Secondary School and can also therefore commit to safeguarding land for the delivery of a pedestrian and cycle bridge over the railway line. Specific comments on Policy TR1 (Transport Proposals) and Policy CI3 (New Community Facilities) are made elsewhere in this Statement.
3.20. With regards to the Sustainable Transport and Highways section of Policy HG1 KS5, Hallam's overall position is that a careful balance needs to be reached between the policy wording being explicit as to what highway works must be delivered and reserving consideration of this until planning application stage where the exact site capacity is better understood and a full Transport Assessment submitted.
3.21. At present, Hallam's view is that the policy wording is overly explicit and suggest that it could be qualified through the addition of the following text before listing the offsite highways improvements:
'Subject to the Strategic Transport Assessment and site-specific Transport Assessment submitted at planning application stage'.
3.22. Turning to the specific offsite highways measures that are listed within the policy wording, Hallam have four comments.
3.23. Firstly, it is suggested that the delivery of an active travel link along the B4265 between the site entrance and the Gileston Road junction should be secured via a financial contribution that is pooled with KS4 Church Farm. This reflects that the delivery of this link not only links Hallam's site to other services in St Athan but also linking KS4 Church Farm to the services that are proposed and uses for which land is safeguarded within Hallam's site. Clearly this is also to the benefit of existing residents of St Athan. This would reflect the approach that is proposed to be taking for the pooling of Section 106 monies for the delivery of an active travel route between St Athan and Llantwit Major.
3.24. Secondly, Hallam flag the need for the RLDP to be sufficiently flexible with regards to the delivery of an active travel link between St Athan and Llantwit Major. Ultimately, the purpose of delivering this active travel route would be to provide a connection from St Athan to Llantwit Major Railway Station and the delivery of a Railway Station in St Athan would remove the necessity of delivering this active travel connection. Hallam's suggested amendments to the policy wording seeks to reflect this.
3.25. Thirdly, Hallam have been consistent in highlighting that, whilst there is an aspiration to deliver an improved pedestrian link along Llantwit Road, a combination of the road width and the extent of third party ownerships make delivering a continuous link very challenging with a pragmatic approach instead needing to take place that recognises the ability to deliver betterments but acknowledges that delivering a continuous link is unlikely to be possible. Hallam has suggested additional wording to clarify this.
3.26. Fourthly, Hallam highlight that the designing of a loop road within the site to facilitate access by a bus may be superfluous and represent an over-engineered solution given the potential for the St Athan Transport Interchange that land is safeguarded for under Policy TR1 (Transport Proposals) is envisaged to accommodate infrastructure to accommodate a bus connection. On that basis, it is suggested that the following clause is added to the policy wording to reflect that bus connectivity to the site may be delivered not via an internal bus loop:
'Subject to progress on the St Athan Transport Interchange as land is safeguarded for under Policy TR1 (Transport Proposals)'
Community Infrastructure
3.27. There are three points which Hallam wish to make in connection to this element of Policy HG1 KS5.
3.28. Firstly, Hallam suggest that the wording of the part of the policy relating to financial contributions to fund the delivery of additional school places needs to be adjusted. At present this part of the policy is worded as if there is an automatic requirement to provide Section 106 monies for school places where Circular 13/97 is clear that a contribution should only be sought where the schools do not have current projected capacity to accommodate the new children from the development. Hallam's proposed adjustments seek to ensure that this part of the policy reflects this though note that Background Paper 43 Education forecasts a need for a financial contribution to be made for additional school places at all English and Welsh primary and secondary schools that the site is within the catchment of.
3.29. Secondly, Hallam note that Table 10 of Background Paper 34 Community Facilities identifies an existing over-provision of community space within the St Athan Ward of 778sqm and a surplus of 531sqm of community floorspace at 2036 when the level of housing to be allocated in the Deposit RLDP is delivered. It is understood that this is on the basis of no community floorspace being delivered as part of Hallam's proposals or as part of the KS4 Church Farm site. Hallam suggest that the wording of this element of the policy needs to reflect that community floorspace should only be required to be provided in the case of a local shortage in provision. Aligned to this, Hallam also suggest that the reference to specifically providing a 'community building' is adjusted to instead make reference to 'community space'. This reflects that the community space element of scheme, if indeed it is actually required, could be a part of a larger

mixed-use building (probably in the Mixed-Use / Community area) rather than as a standalone building.
3.30. Thirdly, Hallam note the error in the wording of the sixth bullet point under the 'Sustainable Transport and Highways' heading where reference is made to the safeguarding of land on the southern side of the railway line as being identified in Policy CI3(2) where-as it should be Policy CI3(6). This is a minor amendment that should be made to ensure consistency.
Green Infrastructure, Recreation Spaces, and Biodiversity
3.31. The masterplan prepared by PAD Design and submitted by Hallam shows the site delivering a mix of public open space and green infrastructure including the provision of allotments, a Neighbourhood Equipped Area of Play, a Local Equipped Area of Play, and a sports pitch. This is welcomed in Background Paper 32A Green Infrastructure Assessment of Key Sites which, at Paragraph 5.55 recognises that a 'ground up' approach has been taken in the masterplanning approach.
3.32. This is shown indicatively to illustrate the composition of public open space and green infrastructure that the site could provide alongside the other elements of built development that the site is allocated and the masterplan makes provision for.
3.33. Whilst, Hallam recognise the need to provide public open space, the starting point for this should be the Fields In Trust Standards and Hallam therefore suggest an approach where the policy wording is not specific about what forms this should take.

Policy TR1 (Transport Proposals)
4.1. This policy identifies three active travel routes and two public transport schemes that the Deposit RLDP safeguards land for, as well as three highway improvement schemes that are identified as being required to mitigate the impact of development. Two of these are in St Athan – one being the St Athan Transport Interchange for which land is safeguarded for and the second being the Gileston Road Junction which is identified as a required highway improvement. Both are considered in turn below.
St Athan Transport Interchange
4.2. Hallam support the safeguarding of land for the St Athan Transport Interchange and see that its delivery would be to the benefit of the Key Site itself but also more broadly to St Athan and western parts of the VoG.
4.3. It is clear from discussions with Transport for Wales that there is a strong business case for the delivery of a railway station and that the creation of "critical mass" through residential development around it has a key role in driving its delivery, as does the nationally significant economic role that the Bro Tathan Enterprise Zone has and the Aberthaw Green Energy Park will have. The proximity of St Athan to both of these hubs clearly contributes to its fundamental sustainability and suitability for growth whilst the further development of a critical mass of housing and employment generating uses will further support linkages between them and strengthen the business case for a new railway station at St Athan. This is reflected in TFW's 'Today, Tomorrow, Together: A Vision for Rail Across Wales and the Borders' which confirms that the delivery of St Athan Railway Station remains in TFW's pipeline which has been endorsed by the Westminster Government.
4.4. The location that is identified on the Proposals Map is Transport for Wales' preferred location within the site and has been incorporated into the masterplanning approach which seeks to create a node around it by incorporating a bus interchange and a mix of uses.
4.5. At present, the Proposals Map identifies the location of the Railway Station using a red star which is positioned on the railway line itself but without the required land take not spatially being defined.
4.6. Whilst Hallam recognise that the exact land take required will need to be refined further through discussion with TFW, it may be the case that the mixed-use element on this portion of the site comes forward before the Railway Station.
4.7. The early delivery of these elements should be welcomed as clearly the mixed-use element both enhances the range of services and facilities in St Athan but also would mean that the Railway Station is integrated upon delivery.
4.8. On that basis, it is imperative that the safeguarding of land for the Transport Interchange is limited only to that land required to deliver the Transport Interchange and is done in such a way such the safeguarding does not sterilise non-transport related development from this portion of the site until the Railway Station has been delivered.
Gileston Road Junction, St Athan
4.9. Paragraphs 6.199 and 6.200 relate to the expectation that vehicle trips as a result of RLDP allocations in St Athan are anticipated to trigger the need to upgrade the Gileston Road Junction to a signal-controlled arrangement. This is informed by the conclusions of Table 3 of the Strategic Transport Assessment which forecasts that the junction will be operating above capacity during both the weekday AM and PM peak by the RLDP's end point.
4.10. Hallam note that Technical Note 08 of the Strategic Transport Assessment identifies that the improvements to the Gileston Road Junction are to be delivered by VoG and funded through financial contributions from seven sites that the RLDP proposes to allocate.
4.11. Improvements to this junction are to be funded by a number of sites; however it is unclear whether (and if so, when) forward funding will be secured by the Council and clearly there cannot be a situation where none of the sites can deliver homes until strategic highways works are funded / completed. We therefore seek further clarification over the phasing of these works and note that early delivery of homes ahead of strategic highway improvements is likely to be important for deliverability of each strategic site.
4.12. To respond to Hallam's above comments, one approach could be for references to highway improvement works to be entirely removed from this policy or, if they are to remain, that qualifying text is added to note that the need for and format of any improvements will be subject to detailed consideration at planning application stage and that such contributions must be justified in planning terms, particularly where (in the case of Pen Y Turnpike Road and Waycock Cross for Land to the West of St Athan), the distance from a site and the junction to be improved is significant and therefore thee number of vehicle trips that would be generated modest.
4.13. This aligns with Hallam's suggested approach to the specific wording of Policy HG1 KS5.

Policy CI1 (Open Space Provision)
5.1. This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.
5.2. Hallam note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.
5.3. Hallam is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter.

Policy CI3 (New Community Facilities)
6.1. As well as allocating land for five new or improved education developments, this policy safeguards 'Land South of the Railway Line, St Athan' for the delivery of a Welsh-medium secondary school.
6.2. This policy is clearly of interest to Hallam because Paragraph 6.250 places a requirement for the safeguarding of land on the northern side of the railway line on their Land to the West of St Athan Key Site for a footbridge to land on.
6.3. With the policy wording being intentionally light-touch, Paragraph 6.250 of the Deposit RLDP provides greater detail about the safeguarding of this land (and other paragraphs in the Deposit RLDP relate to other community facilities that Policy CI3 covers). It effectively does two things.
6.4. Firstly, it notes that the delivery of this school will require active travel improvements including the safeguarding of land for a pedestrian and cyclist footbridge over the railway line.
6.5. Secondly, it is clear that the safeguarding of this land is in response to a forecast increase in demand for Welsh-medium secondary school places across the whole of the VoG as a result of expanded capacity at Welsh-medium primary schools across the VoG. On this basis, it follows that this location has been selected as a preferred location because of its ability to serve the wider sub-region.
6.6. Hallam recognise that this site could be a suitable location for a Welsh Medium Secondary School and, as a principle, is agreeable to the safeguarding of land for the footbridge landing on the northern side of the railway line.
6.7. Paragraph 6.250 of the Deposit RLDP is clear that the delivery of a Welsh-Medium secondary school is in response to a regional / sub-regional demand rather than a local need as a result generated either by the development of Land West of St Athan or other emerging allocations within St Athan and it cannot be the case that Hallam are expected to make disproportionate contributions to either the delivery of the school or required active travel improvements just because they have control of the site or that it is next to the Key Site.

Policy CC1 (Residential Operational Net Zero Carbon Development)
7.1. The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) before the policy wording sets out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.
7.2. As a starting point, Hallam share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) can present challenges. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this will result in an uneven framework for housebuilders, significantly adding cost and reducing certainty.
7.3. The justification for using planning policy to set requirements exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.
7.4. There are two points to be made by Hallam here:
7.5. Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage that such an approach would not be sound. This Written Ministerial Statement was subject to an unsuccessful judicial review.
7.6. Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations. Where there are existing Local Plans in England that take this approach, they do not align with the Westminster Government's position and there will be no Local Plans emerging including such policies.
7.7. Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs (Bridgend and Merthyr Tydfil) do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound at Examination stage.
7.8. Secondly, Hallam have concerns with the approach that has been taken with regards to viability.
7.9. From Hallam's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of

Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.
7.10. As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated. This is important as it demonstrates that, whilst Hallam do not believe such a policy approach should be taken, the development of the site at the time of the completion of the Development Viability Model for the site is viable whilst meeting the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development).
7.11. Hallam's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. This concern is particularly exacerbated by the fact that, as recognised at Paragraph 6.47 of Background Paper 42 Viability Assessment, takes the lowest estimate for the works required to achieve these policy expectations, Savills' experience – both that of their development land team based in Wales and their environmental sustainability team based across England - is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.
7.12. Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy DNP3 (Glamorgan Heritage Coast)
8.1. This policy relates to the Glamorgan Heritage Coast, identifying a series of land uses that are permissible within the policy area before setting three tests that must be satisfied for development within the Glamorgan Heritage Coast to be permissible where there is an adverse environmental impact.
8.2. Hallam note that the 'Land South of the B4265, St Athan' portion of the land that they control is both proposed to be retained as part of the Glamorgan Heritage Coast (a continuation of the position taken in the adopted LDP) whilst also forming part of the Land to the West of St Athan Key Site where the masterplan at Figure 17 shows it as accommodating the potential new railway station and a mixed-use area (including car parking).
8.3. The relevant extract of the Proposals Map is replicated below:
8.4. The exact composition of the buildings proposed on this portion will require further refinement and will need to be driven by occupier requirements, but the masterplanning work undertaken by pad Design envisages that they could provide a mix of retail and food and drink uses most likely across some or all of the ground floor, alongside workshop, co-working or office incubator space at upper floor levels and perhaps at ground floor level. There could also be the potential for additional homes, likely in the form of apartments at upper floors, as part of a mix of uses. It is realistic therefore to anticipate that this portion of the site will accommodate buildings of up to three or four storeys with a high plot ratio to reflect the uses and supporting infrastructure that it is to accommodate.
8.5. Hallam's position is that the continued inclusion of this parcel of land as part of the wider Glamorgan Heritage Coast is inappropriate for two reasons.
8.6. Firstly, and its most basic level, the approach of allocating the site for development whilst retaining a designation that inherently seeks to restrict the type, form, and quantum of development, is wholly contradictory.
8.7. Designation of this portion of the site as part of the Glamorgan Heritage Coast will mean, given that the uses that Figure 17 envisages as being delivered on the site are not those that the first part of Policy DNP3 (Glamorgan Heritage Coast) allows for, any application for development will need to demonstrate that there is a compelling need for the development, that the benefits outweigh the harm, and that appropriate mitigation measures are in place. This the potential to prejudice its development or, at very least, greatly impact how it is developed whilst requiring.
8.8. Secondly, it is difficult to see how this land warrants ongoing inclusion within the designated Glamorgan Heritage Coast. This is something that is considered in more detail in the Review of Landscape Character and Visual Amenity (December 2022) prepared by FPCR and submitted as part of the Call for Sites (and also available as part of the consultation on the Deposit RLDP as a piece of Key Site Supporting Information). Paragraph 5.13 of the FPCR document concludes on this piece of land that:
'Through the fieldwork it is considered that the Site does not display any "special environmental qualities" identified by the Policy and plays no intrinsic role in the Policy designation, as it is effectively forms a rather ordinary grazing field. It is influenced by the urbanising elements of the adjacent B4265, the Railway Line, the Tarmac Cement works, and to some degree the built edge of St Athan. Furthermore, it is bound and contained by trees and woodland beside the railway line, which prevents wider intervisibility with the coastline.'
8.9. Taking the above together, Hallam suggest that the preparation of the RLDP provides the opportunity to define the extent of the Glamorgan Heritage Coast to respond to both the landscape value of certain sites but also the wider aspirations of the RLDP. If it is not within the gift of VoG to redefine the boundaries of the Glamorgan Heritage Coast through the RLDP then Hallam suggest that an additional element could be added to this policy to confirm that it does not apply to land which is allocated for development.

Appendix A - rewording of Policy HG1 KS5

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3y3

6787 Comment

Document Element: CI1 – OPEN SPACE PROVISION

Respondent: Persimmon Homes (East Wales) [1068]
Agent: Boyer Planning

Summary:

Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.

The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.

For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.

As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.

Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.

The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):

• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics

Settlement Pattern

In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.

Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".

The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

Housing Market and Housing Need

In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.

Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.

Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.

Section 4: Key Themes, Vision & Objectives

Key Themes

Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the

proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within

the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.
Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.
In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP

Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above

an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.
Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual
As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement
From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified "has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area." It also notes that this level of growth has been chosen so that it is "complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).".

Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.
In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.
Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.
Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.
Policy SSC1 – Development within Settlement Boundaries
Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.
Policy SP4 – Placemaking
In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.
In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car. Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.
The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.
Policy PGD1 – Creating Well Designed and Inclusive Places
Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle

the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.
On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By

AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.

Loss of Allocated Employment Land

Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.

Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.

By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)

Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.

According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.

On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.

Policy HG3 – Housing Led Redevelopment Opportunity

Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.

Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.

Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.

This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.

Policy SP7 – Affordable Housing Provision

In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.

As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.

National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure

delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.

To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.

Policy SP8 – Affordable Housing Requirements

Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.

On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.

Policy SP10 – Sustainable Transport

Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.

In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.

In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.

Policy TR1 – Transport Proposals

Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.

In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.

Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.

Policy SP13 – Community Infrastructure and Planning Obligations

Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.

Policy CI1 – Open Space Provision

Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the

thresholds.
The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.
Productive and Enterprising Places
Policy CC1 – Residential Operational Net Zero Carbon Development
Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.
Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.
The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.
Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.
Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.
Distinctive and Natural Places
Policy SP19 – Green Infrastructure
In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.
The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.
Policy SP20 – Biodiversity and Ecosystem Resilience
In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the

policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Policy DNP1 – Special Landscape Areas

Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.

Policy DNP2 – Green Wedges

Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.

Policy DNP8 – Severn Estuary Recreational Pressure

Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.

The policy also provides no clear threshold or criteria for determining what level of activity would constitute “visitor pressure” or an “adverse impact” on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.

From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan’s ability to meet its housing requirements and risk finding the RLDP unsound.

Conclusion

Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes’ most pertinent comments on the consultation document are summarised below:

• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.

• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale’s position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan’s ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government’s Future Homes Standard (FHS), which is intended to ensure all new homes are “zero-carbon ready” through a consistent national Building Regulations framework.

• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning

Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/38r

6847 Comment

Document Element: CI1 – OPEN SPACE PROVISION
Respondent: Taylor Wimpey [386]
Agent: Savills

Summary:

This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.

Taylor Wimpey note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.

Taylor Wimpey is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter,

Full text:

1. Introduction

1.1.1 Savills is instructed by Taylor Wimpey PLC ('Taylor Wimpey') to respond to the consultation on the Deposit Plan as part of the preparation of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').

1.1.2 The submission is made in the context of Taylor Wimpey's position as the promoter of Site ID 376 (Land West of Swanbridge Road, Phase 3). The site is being promoted for a residential development comprising of 260 homes.

1.1.3 Taylor Wimpey is one of the UK's leading national housebuilders, with extensive experience in delivering high-quality residential developments across a wide range of local authority areas. The company has an established presence within the VoG area. Taylor Wimpey is in the process of delivering Phase 1 of the site with development of Phase 2 close to commencing to dovetail with the completion of Phase 1. Phase 3 would act as a logical extension to the site, effectively rounding off development in this part of Sully and dovetailing with Phase 2 which is anticipated to be completed in 2029.

1.1.4 The site was originally submitted as a candidate site as part of the Call for Candidate Sites stage in September 2022 by Taylor Wimpey. This was a comprehensive site submission demonstrating that the site was viable, deliverable and sustainable – the three tests for Candidate Sites to satisfy as set out in Paragraph 3.36 of the Development Plans Manual. The Candidate Site submission consisted of the following information:

• Archaeological Desk-based Assessment (prepared by RPS);
• Design Vision (prepared by Pegasus Group);
• Drainage Strategy & Flood Risk Assessment (prepared by Pheonix Design);
• Landscape Appraisal (prepared by Pegasus Group);
• Preliminary Ecological Appraisal (prepared by Soltys Brewster);
• High Level Viability Statement (prepared by Savills);
• Transport Technical Note (prepared by Vectos); and
• Supporting Statement (prepared by Savills).

1.1.5 Since then, and on behalf of Taylor Wimpey , Savills have also responded to the consultation on the Preferred

Strategy in February 2024 as well as the Housing Growth in Barry consultation in July 2025 and the Housing Trajectory in October 2025.

1.1.6 This supporting statement is structured to initially comment on the approach taken by the VoG in assessing the Land West of Swanbridge Road, Phase 3 site before commenting on specific policies that are contained within the Deposit RLDP.

1.1.7 In general, Taylor Wimpey's position is that, at present, the Deposit RLDP is not sound but that it could be made sound through the amendments as suggested throughout this Statement.

2. Candidate Site Assessment Process and Integrated Sustainability Assessment
Introduction

2.1.1 Candidate sites are in essence assessed through two means – the Candidate Site Assessment Background Papers and the Integrated Sustainability Appraisal.

2.1.2 Taylor Wimpey's position is that both of these documents do not provide an adequate assessment of the Land West of Swanbridge Road, Phase 3 site.

2.1.3 Each is considered in turn below.

Candidate Site Assessment Process

2.1.4 All candidate sites have been assessed at Preferred Strategy stage (reported as Background Paper 18) and Deposit stage (reported as Background Paper 18a).

2.1.5 The reason for the Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site not being carried forward as part of these assessments was presented in Background Paper 18 at the time of publication of the Preferred Strategy with Backgropund Paper 18a providing no further site analysis. The reason for the site not progressing this stage of the Candidate Site assessment process is as follows:

"Development of the site would lead to a loss of the Best and Most Versatile Grade 3a agricultural land contrary to national policy."

2.1.6 Whilst parts of the site do constitute Best and Most Versatile (BMV) land, Taylor Wimpey's position is that there are compelling reasons relating to the site's context and how it is utilised that mean a more nuanced position needs to be taken. Without such nuance, the RLDP risks not allocating a site that, whilst perhaps containing BMV, is otherwise suitable for development and more suitable for development then sites that the Deposit RLDP proposes to instead allocate.

2.1.7 Included at Appendix A, and included as part of Taylor Wimpey's representations on the Preferred Strategy and the Housing Growth in Barry consultations, is an Agricultural Assessment prepared by The Andersons Centre.

2.1.8 The key conclusions from this Assessment are that:

• The site is farmed by a tenant farmer whose main base is approximately 12km away which presents logistical and practical challenges. These challenges are exacerbated by the lack of farm buildings and the fact that there is no mains electricity;

• The site forms part of a wider 230 acre farm and so the cessation of agricultural practices on this parcel will not, by virtue of its size, prejudice the continued farming of the wider land parcel;

• The tenant farmer farms approximately 3,000 acres of land and so the loss of the ability to farm this parcel will have a negligible impact on the continuation of their agricultural operations;

• The site is bound on two sides by existing or permitted housing, on a third boundary by a railway line, and on its eastern boundary by a road; and

• Farming of the land does not support a high level of employment and if the land was lost for development, 0.15 of a full time labour unit's equivalent work would be lost.

2.1.9 Taking the above together, the conclusion needs to be reached that the site's size and context presents challenges for farming and that the development of Phase 2 by Taylor Wimpey has the potential to exacerbate these challenges. Aligned to this, the level of employment that the farming of the site supports is negligible and the cessation of farming of this particular parcel of land will not materially impact either the continued farming operations of the wider farm that the land sits apart of or the tenant farmer that farms the land.

Integrated Sustainability Appraisal

2.1.10 The Initial Integrated Sustainability Appraisal undertaken at Preferred Strategy stage provides a GIS based appraisal of all sites against 17 objectives. Inherently the Initial Integrated Sustainability Appraisal can be a bit of a blunt tool but Taylor Wimpey's position is that the site performs better against a substantial number of the 17 objectives than the current assessment.

2.1.11 Included at Appendix B is an assessment undertaken by Taylor Wimpey which provides commentary against certain objectives and suggests why the site performs considerably better than forecast in the Initial Integrated Sustainability Appraisal.

2.1.12 A summary of this is presented below:
Table 1 Summary of ISA and Suggested Taylor Wimpey Approach

2.1.13 Taylor Wimpey's position here is clear – the inadequacy of the Integrated Sustainability Appraisal as a tool for assessing candidate sites can only be appropriate where the Integrated Sustainability Appraisal is done correctly and considers the mitigation measures that a candidate site submission proposed to put in place. Without this, the Integrated Sustainability Appraisal risks a situation – as Taylor Wimpey suggest has been the case in Policy HG1 KS1 – where a Key Site is selected in favour of alternative sites that are better performing.

3. Deposit Plan

3.1 Introduction

3.1.1 The following section of this Statement comments on the relevant Key Themes, Strategic Objectives and draft Policy Framework forming part of the Deposit Plan Consultation.

3.1.2 The Policy Framework has been reviewed with comments provided on only those policies considered to be of most relevance to Land West of Swanbridge Road (Phase 3), Sully. The position on individual policies contained within the Deposit RLDP are summarised in the table below:

Table 2 Taylor Wimpey Policy Position

Relevant Policy Support or Object
SP1 Sustainable Growth Strategy - Object
SP2 Settlement Hierarchy - Support
SP 6 Housing Requirement - Object
HG1 Housing Allocations: HG1 KS1 – Land at North West Barry - Object
TR1 Transport Proposals: TR1(2) Active Travel Route Sully to Cosmeston - Support
TR1 Transport Proposals: TR1(6) Highway Improvement Works Weycock Cross Roundabout - Object
CC1 Residential Operational Net Zero Carbon Development - Object
CI1 Open Space Provision - Clarity required
DNP5 Environmental Protection - Object as currently worded

3.2 Key Themes and Strategic Objectives

Homes For All

3.2.1 As noted in paragraphs 3.17 and 3.18 of the Deposit Plan the VoG has the highest affordability ratio in Wales with average house prices 9.7 times the average workplace earnings compared to the Welsh average, giving rise to a significant need for affordable homes which is under significant pressure. This highlights the ever increasing need for sufficient high quality housing, which Taylor Wimpey are committed to provide and supply the mix, type and tenure of housing needed within the local authority's growing population.

Placemaking

3.2.2 Taylor Wimpey embed strong placemaking standards across their developments as detailed within their Placemaking Charter. Taylor Wimpey consider Land West of Swanbridge Road (Phase 3) to present an opportunity to provide a comprehensive residential development that is accessible and well-connected with the existing settlement of Sully and compliments the earlier phases of development. As demonstrated in the earlier phases of development, the Site offers a sustainable location for future growth with easy access to a range of services and facilities in Sully.

Protecting and Enhancing the Natural Environment

3.2.3 Taylor Wimpey support the VoG's commitment to protect and enhance the natural environment through the integration of green/blue infrastructure network and the sustainable management of resources within the VoG. However where Objective 5 seeks to safeguard land from inappropriate development, proposals must be subject to the relevant planning balance giving weight to the surrounding land use and appropriateness of safeguarding agricultural land that would otherwise be unconstrained and considered suitable for development given the outstanding need for housing.

Promoting Active and Sustainable Travel Choices

3.2.4 Taylor Wimpey support the promotion of sustainable travel and active modes of transport, including the provision of designated active travel routes that improve the connectivity between primary and key settlements, such as the Sully to Cosmeston active travel route.

3.2.5 As demonstrated in the earlier phases of Land West of Swanbridge Road, Taylor Wimpey support the promotion of active travel within new developments and provide opportunities for residents to easily engage with active travel.

3.3 Policy Framework

Policy SP1 Sustainable Growth Strategy

3.3.1 Taylor Wimpey's comments on this policy relate to the sustainable growth strategy in so much as it relates to the spatial strategy rather than the housing requirement that the RLDP adopts with further comments on the housing requirement provided in connection to Policy SP6 (Housing Requirement).

3.3.2 Taylor Wimpey appreciate the need to balance the ten strategic objectives against the need for growth and protection of the VoG's natural and built environment, and strongly support the strategic objective to provide homes for all. Taylor Wimpey maintain their position on the proposed growth strategy that has been established within earlier consultation responses submitted throughout the RLDP process, including the most recent consultation on 'Growth Options in Barry'.

3.3.3 Taylor Wimpey consider that to date the growth strategy has placed disproportionate emphasis on identifying an alternative site within Barry, rather than giving due consideration to potential sites in nearby high-performing settlements such as Sully. Taylor Wimpey therefore strongly encourage the VoG to widen the search for additional allocations beyond the administrative boundary of Barry Town Council and to consider locations that represent a logical and sustainable extension to neighbouring primary settlements that are located within the Strategic Growth Area, including Sully.

3.3.4 The six key elements of the Sustainable Growth Strategy are noted and Taylor Wimpey support a spatial strategy that locates major new development for the delivery of sustainable housing growth in appropriate locations, such as Sully, that are supported by the relevant infrastructure, services and facilities. Providing new homes within Phase 3 aligns with the Strategic Growth Area identified within the RLDP Strategy which forms the primary focus for housing growth.

3.3.5 Policy SPG1 continues to identify Sully as a location where new housing development will be concentrated, therefore establishing a principle of development for Phase 3 and help to further align the provision of new housing with the existing facilities of Sully, reducing the need to travel. Sully represents an inherently sustainable location for future growth and aligns well with the Sustainable Transport Oriented Growth Option. As identified in the Deposit RLDP, Sully is classified as a Primary Settlement and performs a complementary role to Barry as a key centre. Its position within the Strategic Growth Area further indicates that an appropriate level of development at Sully would be acceptable, with both existing housing delivery and the current allocation at Swanbridge Road supporting its established role.
3.3.6 With existing development ongoing to the north of the Site, at Phases 1 and 2 of Land West of Swanbridge Road, Phase 3 is considered to provide an appropriate level of growth in a sustainable location that would form a logical extension to existing allocations. The sustainability and suitability of Sully to accommodate residential development is reinforced by the allocation of 500 dwellings under Policy MG2(37) ('Land West of Swanbridge Road, Sully') on land directly north of the site promoted by Taylor Wimpey. The progression of this location into a phase 3 development would continue to strengthen Sully's function as a primary settlement and would constitute a logical and coherent extension to the existing built form.

Figure 1 Extract of Growth Strategy

3.3.7 Taylor Wimpey appreciate the aspirations of the Council to deliver housing to meet the identified future housing needs of the VoG and wider growth aspirations of the South East Wales Region at a strategic level. Taylor Wimpey support the revised strategy moving away from North East Barry, however maintain the position that this level of growth should be re-allocated to those locations that are most suitable for growth, including sustainable settlements outside of Barry. Growth should not be focuses solely on Barry.

Policy SP2 Settlement Hierarchy

3.3.8 Taylor Wimpey support the conclusions of the Settlement Appraisal Review Background Paper which identifies Sully as a Primary Settlement, reflecting its important role in providing a level of housing growth, in addition to key local services and facilities. Within this Background Paper, Sully is recognised for its vital role as a sustainable community, scoring highly across all key principles in demonstrating its sustainability by providing for the day-to-day needs of its residents. Taylor Wimpey concur with the supporting evidence which reinforces Sully's importance within the settlement hierarchy.

3.3.9 Whilst Draft Policy SP2 presents a 'broad distribution of development within the Strategic Growth Area..', serious concerns continue to be raised around the level of growth around Barry and the emphasis placed on it as the focus for future development. Taylor Wimpey do not dispute the identification of Barry as a Key Settlement, given its position as the largest town within the VoG, however believe Barry should not remain the sole focus for growth where there are opportunities available around primary settlements located within the Strategic Growth Area.

3.3.10 Put another way, it seems perverse for the Deposit RLDP to direct no new growth to a Primary Settlement within the identified Strategic Growth Area.

Policy SP 6 Housing Requirement

3.3.11 The purpose of this policy is to set the housing requirement and then identify the components of supply that are anticipated to meet this housing requirement. A number of Background Papers (nos. BP7, BP8, BP8A, ad BP9A) underpin the approach that is taken. Taylor Wimpey have a number of comments to make on the approach taken in this policy.

Housing Requirement

3.3.12 The approach taken in the Deposit RLDP, as with the Preferred Strategy beforehand, is for the housing requirement to make use of a 10 year dwelling-led scenario, an approach that reflects past completions and looks to extrapolate this forward over the lifetime of the RLDP.

3.3.13 Taylor Wimpey provided detailed commentary on the proposed housing requirement in their comments on the Preferred Strategy but note that Welsh Government have subsequently provided their comments on the Preferred Strategy raising no objection with the housing requirement proposed to be taken.

3.3.14 Taylor Wimpey's position though remains – if a dwelling-led scenario is to be used to determine the housing requirement then it needs to have a far shorter scenario length then 10 years as the first three years of the 10 year period selected were when supply was suppressed as a result of the current LDP not having been adopted.

3.3.15 That said, there is a clear contextual change since the Preferred Strategy was adopted, this being the publication of the 2022-based household projections have been published. Table 5 of Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections provides a comparison of the 2022-based projections with the 2018-based projections and the Deposit RLDP's housing requirement. A simplified version of this table is shown overleaf:

Table 3 RLDP Housing Requirement
Scenario Housing Requirement
RLDP 7,587
2018-based projections 6,214
2022-based projections 9,623

3.3.16 This is important as Paragraph 4.2.6 of PWW states that:

'The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans.'

3.3.17 The proposed approach of continuing to use the 10 year dwelling-led scenario, as a methodology, clearly does not do this.

3.3.18 The approach of using the 2022-based household projections would comply with the aspirations of PPW. Taylor Wimpey's position is that the commentary provided in the Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections for not using 2022-based projections is wholly inadequate and that these projections should be used.

Flexibility Allowance

3.3.19 Paragraph 5.58 of Edition 3 the Development Plans Manual (March 2020) makes it clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes the RLDP should plan for. This is in the interest of ensuring that sufficient housing is delivered in the event of some allocated sites either not delivering in their entirety or delivering less homes than anticipated. Paragraph 5.59 of the Manual clarifies that the extent of the flexibility allowance should be informed by local issues with 10% as a starting point (i.e. as the minimum).

3.3.20 The Adopted Local Development Plan (ALDP) applies a 10% flexibility allowance on top of the housing requirement for 9,460 homes so that provision is made for 10,408 homes.

3.3.21 Paragraph 1.2.34 of the Annual Monitoring Report 2024-2025 provides a comparison of the number of homes that have been completed and the level of completions that the ALDP anticipates. This shows that 6,999 homes have been

delivered up to 1st April 2025 against a cumulative dwelling target of 8,829 homes, representing a shortfall of 20.7%.

3.3.22 Taylor Wimpey's point here is that the ALDP's flexibility allowance of 10% is insufficient to ensure that the ALDP's housing requirement is actually being delivered. This is clear evidence that a higher flexibility allowance should be used for the RLDP. Although for different reasons, but following a direction from the Welsh Government Planning Inspector, Bridgend County Borough Council has increased its flexibility allowance to 20% and, it is considered that such a buffer is appropriate for the VoG's RLDP.

Non-Delivery Allowance on Land Bank

3.3.23 Line C of Table 2 of the Preferred Strategy relates to those sites that either benefit from planning permission or are subject to a resolution to grant planning permission subject to planning permission. Combined, these sites are identified as having capacity for 1,860 homes.

3.3.24 The current approach, which assumes that all other sites which are under construction or sites where there is either a planning permission in place or sites where there is a resolution to grant planning permission subject to the signing of a Section 106 agreement will be completed in full, causes concern for Taylor Wimpey.

3.3.25 There are multiple reasons why homes that benefit from either planning permission or a resolution to grant planning may not be delivered. These relate to viability, but also to specific site constraints and landowner intentions.

3.3.26 A point that is separate, but inherently linked, to the above is that often the capacity of a site for which reserved matters approval is sought is less than that permitted at outline stage. Requirements for SAB approval and the demonstration of a biodiversity net benefit, for example, reduce the capacity of a site at detailed design stage but are often not factored in at outline stage, particularly where the outline application is not progressed by a housebuilder.

3.3.27 Research undertaken by the Local Government Association for England (no such data is available for Wales) suggests that, between 2010/2011 and 2019/2020 a total of 2,782,300 dwelling were granted planning permission whilst there were only 1,627,730 completions. This means that during this period just 58.5% of those homes which were granted planning permission were completed.

3.3.28 Taylor Wimpey is not suggesting that applying a discount of 41.5% is necessarily correct and the above is both from England and a few years out of date but the need for a discount that relates specifically to Line C is very clear.

3.3.29 It's difficult to know what this figure should be but Taylor Wimpey suggest that a 20% figure is used to reflect the flexibility allowance.

Windfall Allowances

3.3.30 The approach taken in the Deposit RLDP is to assume that 1,303 homes will be delivered across Windfall Sites. This has been calculated on the basis of previous completion delivered as windfalls.

3.3.31 Taylor Wimpey's concern is that the delivery of homes on Windfall Sites inherently becomes more challenging over time as the easier to develop sites have been delivered and the buildings and land that hasn't been developed is subject to increasing levels of policy protection. The approach taken by Cardiff Council in their Deposit RLDP is to assume that 75% of the 10 year average Windfall Sites will be delivered and such an approach seems entirely appropriate in this case.

3.3.32 An Urban Capacity Study (October 2023) prepared by the VoG, seeks to corroborate this by identifying 2,627 homes that could be delivered across the VoG. Whilst the windfall allowances would be less than the suggested urban capacity, this shouldn't be seen as problematic or as a conflict as the purpose of the Urban Capacity Study is, as the name suggests, just to identify sites which may have capacity. It doesn't account for land ownership (and whether the land owners have aspirations to dispose of the site) or development viability. In addition, the approach taken to site capacity to is to assume a density based on site type but it does this without an appreciation of site constraints and is based on the gross rather than net area.

Rolled Forward Sites

3.3.33 Taylor Wimpey have concerns with the approach that is taken in Table 2 of the Deposit RLDP which identifies allocations for 959 homes that are to be rolled over from the ALDP to the RLDP.

3.3.34 Concerns are raised around two sites in particular - Land to the west of Pencoedtre Lane, Barry and Land between new Northern Access Road and Eglwys Brewis Road, These sites are allocated in the ALDP but have failed to be delivered. Given the longstanding period during which there has been clear policy support for development but no completions, it follows that there are serious concerns around the deliverability of these two sites which, together, are allocated for 370 homes.

3.3.35 The failure to deliver these dwellings is due to a number of factors which are detailed in Taylor Wimpey's

Preferred Strategy consultation response, which questions whether these sites will deliver at all or at a significantly reduced capacity due to the following reasons:

- Viability constraints;
- Site specific constraints;
- Landowner intentions;
- Requirements for SAB approval; and
- Biodiversity net benefit;

3.3.36 Whilst it is recognised that there may be policy support for the delivery of these two sites, there deliverability is clearly uncertain and they should be removed from Table 2.

Conclusion

3.3.37 The following table summarises the approach previously proposed in the Deposit RLDP and compares it to the amendments suggested by Taylor Wimpey in the preceding sections of this Statement.

Table 4 Deposit RLDP Housing Supply and Taylor Wimpey's Suggested Approach
Housing Supply - Deposit Plan (December 2025) - Taylor Wimpey Suggested Approach (March 2026)
Housing Requirement - 7,890 - 9,623
Flexibility Allowance - 10% - 20%
Flexibility Allowance – 770 - 1,925
Housing Requirement + Flexibility Allowance - 8,660 - 11,548
A – Completions - 1,747 - 1,747
B – Units Under Construction - 313 - 313
C and D- Units with Planning Permission Minus Non-Delivery Allowance - 1,777 1,488
Existing Supply - 3,827 - 3,548
E – Large Windfall Sites - 720 - 540
F – Small Windfall Sites - 583 - 438
E+ F Total Windfall Allowance - 1,303 - 978
RLDP Allocations - 3,520 - 3,150

3.3.38 The conclusion reached in Taylor Wimpey's analysis is that, as a result of both the suggested housing requirement and flexibility allowance combined with Taylor Wimpey's comments on the components of supply, the Deposit RLDP needs to find allocations to deliver a further 3,872 homes.

Policy HG1 KS1 – Land at North West Barry
3.3.39 Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. Taylor Wimpey has provided comments on the housing requirement that is set in the RLDP and the components of supply that are anticipated to meet it in the proceeding sections of this Statement.

3.3.40 As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.

3.3.41 There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.

3.3.42 Policy HG1 KS1 proposes to allocate the site known as 'Land at North West Barry'.

3.3.43 The proposed allocation of this site follows a consultation – entitled 'Housing Growth in Barry' - undertaken by the VoG in July 2025 which proposed to allocate three sites in Barry as an alternative to the North East Barry site that was identified as a Key Site in the Preferred Strategy but was considered to no longer be deliverable.

3.3.44 Taylor Wimpey responded as part of the 'Housing Growth in Barry' consultation, supporting the removal of North East Barry as a Key Site but raising serious concerns with the proposed allocation of 'Land at North West Barry' as an alternative.
3.3.45 These concerns remain and Taylor Wimpey strongly consider there need to be other alternative sites – such as Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) - within nearby settlements that perform better than the Land at North West Barry site and should be allocated for housing.
3.3.46 To support this conclusion, Taylor Wimpey has undertaken a review of the Integrated Sustainability Appraisal (ISA) which provides a scoring of different candidate sites against the 17 objectives as well as considering and comparing the sustainability and accessibility of the two sites.

Integrated Sustainability Appraisal

3.3.47 The below table provides a comparison of how the Integrated Sustainability Appraisal scores Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) compared to the Land at North West Barry site. Two different comparisons are provided – one which compares the actual scoring in the ISA and a second which compares the two sites following Taylor Wimpey's suggested scoring which is included as Appendix A.

3.3.48 These tables clearly highlight where the subject site out performs North West Barry across numerous objectives.

Table 5 Comparison of Phase 3 Land West of Swanbridge Road (Site ID 376) and North West Barry (Site ID 490) ISA performance

3.3.49 From an initial review, the Integrated Sustainability Appraisal shows that Land West of Swanbridge significantly outperforms North West Barry in terms of the number of significantly positive scores '++' and the number of '—' scores. To this end the subject site provides clear advantages above and beyond North West Barry in terms of homes, health, and transport. As such Land West of Swanbridge is considered to have the capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge; The site is within 800m of a health service and an active travel route; and, The site is within close proximity (≤800m) to a railway station or bus stop, town/ retail centre and an active travel route. Taylor Wimpey consider this assessment should go further to recognise the associated benefits to the leisure than be provided by the site's development.

3.3.50 Following Taylor Wimpey's re-assessment of the site against the Integrated Sustainability Appraisal ISA objectives it is also considered to obtain notably more positive '+' scores than North West Barry. It is also worth noting that North West Barry has more unknown impacts than Land West of Swanbridge which introduces a level of uncertainty around its potential for further negative impacts. Moreover, North West Barry scores a significant number of negative impacts across the ISA, with the extension site obtaining double the amount than Land West of Swanbridge Road.

3.3.51 Taylor Wimpey's position is that it would be unsound to allocate a site that performs considerably poorer in the Integrated Sustainability Appraisal than a site that is not proposed to be allocated.

Accessibility and Sustainability

3.3.52 SLR Consulting have prepared an updated document demonstrating the Site's sustainability credentials and providing a detailed overview of existing and future active travel and public transport infrastructure. This is included as Appendix C.

3.3.53 As a starting point, it considers those services within Sully. In terms of local amenities, the population size of Sully, naturally benefits from a good range of local amenities and services, and therefore it is anticipated that a high proportion of future residents' day-to-day journeys would be contained within the village and undertaken via walking or cycling. The Walking Catchment Map prepared by SLR demonstrates this and illustrates services within walking distance from the Site.

3.3.54 The proposed development benefits from local existing and future / planned infrastructure which will help support travel by sustainable modes such as walking, cycling and public transport. The Site falls within the less than 15 minutes Public Transport Catchment for bus and rail services. The Site is supported by the existing bus network, connecting Sully with Barry, Penarth and Cardiff – the nearest bus stop approximately 400m from the centre of the site; Moreover the Site is within proximity to Cadoxton and Penarth railway stations which have regular services in each direction in addition to the existing walking and cycling infrastructure in and around Sully.

3.3.55 The future accessibility of the Site will be further enhanced through the ongoing and planned South Wales Metro improvements, future active travel routes and the proposed Sully to Penarth mixed use link. The below figure shows several newly proposed active travel routes running close to the site including a new walking / cycling route along Swanbridge Road. Planning applications are now being submitted to support the delivery of these new active travel links. In March 2025 a planning application was submitted proposing a new route between Palmerstown and Dinas Powys.

3.4 SLR have undertaken further assessment work comparing the sustainability credentials of Land West of Swanbridge Road to Land North West of Barry. Land North West of Barry, is separated from the existing built-up area by the B4266 Pontypridd Road where the eastern and southern boundaries abut residential properties. As such, the proposed access for all modes would be taken from the A4226 Port Road West. The A4226 and B4266 can be a barrier to the promotion of active travel in that they facilitate vehicular travel and do not provide an attractive environment for pedestrians.

3.5 Furthermore, Land North West of Barry is on the fringes of Barry and had few if any facilities within a 10 minute walk, other than bus stops. In comparison, Land West of Swanbridge Road in Sully benefits from its proximity to the High Street in Sully and the services there.

3.6 The below table demonstrates differences in accessibility to amenities between the two sites, where Land West of Swanbridge Road presents a more favourable location for future development.

Table 6 Comparison of Local Facilities Between Land North West of Barry (Site ID 449) and Land West of Swanbridge Road (Phase 3) (Site ID 376)

3.7 Whilst the walking distance shown from Land North West of Barry to the nearest bus stop is slightly less than the Swanbridge Road Site, it should be noted that the bus services that can be accessed from Sully are more frequent and more direct than those which can be accessed from Land North West of Barry.

Conclusion

3.8 Taking the above together, the conclusion Taylor Wimepy reach is that their Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site performs more strongly than the Land North West of Barry site.

Policy TR1 Transport Proposals

3.9 The draft transport proposals contained within the Deposit RLDP have been reviewed with the following proposals considered to be pertinent to the Site and draft residential allocations.

TR 1 (2) Active Travel Route: Sully to Cosmeston

3.10 Taylor Wimpey support the designation of an active travel route connection the eastern side of Sully with Cosmeston in the north-east. Most notably the proposed route will pass Swanbridge Road which provides direct access to Land West of Swanbridge Road Site, with Phase 3 in close proximity to the travel route. The proposal would further enhance the accessibility and sustainability of the Site as a logical extension for residential development in Sully.

Figure 4 Extract of Deposit RLDP Proposals Map with Land West of Swanbridge Road (Phase 3) Identified

TR1 (6) Highway Improvement works: Weycock Cross Roundabout, Barry

3.11 Taylor Wimpey raise concerns around the proposed works at the Wyecock Cross Roundabout, compared to the other improvement works proposed. As noted in the Deposit RLDP, this roundabout forms a key connection within the wider strategic highway network and therefore of high importance for the local area and surrounding communities. The proposed options presented within the Deposit RLDP provide little certainty of the scope of works required with no preferred option identified. This raises concerns around the impacts of the highway improvements on the deliverability of the adjacent draft allocation of North West Barry. The same concerns arise when considering the roundabout improvement works in combination with the proposed access strategy contained within North West Barry's supporting information package. The proposed road widening measures (c.11m increase) required to make the draft allocation accessible would have a significant impact on the wider transport network at this strategic junction.

Policy CC1 (Residential Operational Net Zero Carbon Development)

3.12 The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) then setting out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.

3.13 As a starting point, Taylor Wimpey share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) is not appropriate. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this results to an uneven framework for housebuilders, significantly adding cost and reducing certainty.

3.14 The justification for exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.

3.15 There are two points to be made here:

3.16 Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage. This Written Ministerial Statement was subject to a judicial review which was dismissed with the position taken in it found to be legally sound.

3.17 Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when

the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations.

3.18 Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound.

3.19 Secondly, Taylor Wimpey have concerns with the approach that has been taken with regards to viability.

3.20 From Taylor Wimpey's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.

3.21 As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated.

3.22 Taylor Wimpey's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. Savills' experience is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.

3.23 Taylor Wimpey's other concern with this approach is that the figure assumed as being required to achieve the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is driven from a Cost Assessment report published in January 2024. With the Background Paper 9A Housing Land Supply and Housing Trajectory not forecasting first completion onsite until 2028/2029, there is likely to be a period of approximately five years from the establishment of the figure for delivering the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) and when the first units would be delivered onsite.

3.24 Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy CI1 (Open Space Provision)

3.25 This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.

3.26 Taylor Wimpey note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.

3.27 Taylor Wimpey is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter, Policy DNP5 Environmental Protection

3.28 Taylor Wimpey consider the inclusion of 'the loss of the best and most versatile agricultural land' to be at odds with the other elements listed, where unlike the others mentioned, the loss of agricultural land would have limited, if any, impact on people, residential amenity and property.

3.29 It is acknowledged that the loss of BMV agricultural land may impact the VoG's overall amount of high quality agricultural land, however this should be assessed against the existing high level of BMV agricultural land within the County. The extent to which its loss is considered "unacceptable" should be subject to the planning balance against the overriding need for affordable housing and local housing need. Consideration towards the farming business case and economic viability are also required within the planning balance. In the case of Land West of Swanbridge Road, the loss of BMV agricultural land remains the only constraint that cannot be overcome, as noted in the Candidate Site Assessment. Whilst the loss of high quality agricultural land should be avoided, Taylor Wimpey consider that where the merits of the Site are overwhelmingly in favour for sustainable residential development in a suitable and logical location, Policy DNP5 should not stand in the way of housing delivery.

3.30 Whilst Taylor Wimpey support the clause within the draft policy: "Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the impact identified to an acceptable level. Planning conditions may be imposed, or legal obligation entered into, to secure any necessary mitigation and monitoring processes." However, in the context of BMV agricultural land, it is not clear how the mitigating

measures, in the form of planning conditions or legal obligations, can be applied. This reinforces the earlier view that the inclusion of 'the loss of the best and most versatile agricultural land', as currently worded within the draft policy, is at odds with the other elements listed where mitigation strategies for pollution can be suitably conditioned.

Change suggested by respondent:

Clarification regarding the reasoning for the increased level of public open space requirements in Policy CI1 (Open Space Provision).

Sound: Not specified

Attachments:

Redacted Deposit Representation Form - https://valeofglamorgan.oc2.uk/a/3c8
Redacted Candidate Site Rep Form - https://valeofglamorgan.oc2.uk/a/3c9
Redacted Candidate Site Rep Form 2 - https://valeofglamorgan.oc2.uk/a/3cv
Redacted ISA HRA Representation Form - https://valeofglamorgan.oc2.uk/a/3cb
Redacted Supporting Evidence - https://valeofglamorgan.oc2.uk/a/3g5

6920 Comment

Document Element: CI1 – OPEN SPACE PROVISION
Respondent: Barratt Redrow Homes [2669]
Agent: Boyer Planning

Summary:

Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Barratt Redrow query the requirement for an Open Space Strategy for all sites that meet the thresholds.
The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.

Full text:

1. INTRODUCTION
1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.
1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:
• Section 3 – The Vale of Glamorgan Key Characteristics;
• Section 4 – RLDP Key Themes, Vision, and Objectives;
• Section 5 – Sustainable Growth Strategy; and
• Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.
1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS
Settlement Pattern
2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.
2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Need
2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to

ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
3. RLDP KEY THEMES, VISION, AND OBJECTIVES
3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.
Key Themes
3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and

consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY
Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore,

relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be

resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

5.10 For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

5.11 More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

5.12 Whilst Barratt Redrow appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range, having reviewed the Deposit Plan evidence base Barratt Redrow believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.

5.13 In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

5.14 Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).

5.15 In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

5.16 In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need. Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036) and therefore is made up of

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-

making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.

5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.

5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.

5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.

5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.

5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.

5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.

5.27 In summary, Barratt Redrow acknowledge the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

5.28 These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance and additional site allocations, such as Swn Y Coed, Wenvoe, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

Policy SP2 – Settlement Hierarchy

5.29 Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.

5.30 Accordingly, despite Wenvoe being identified as a primary settlement, Policy SP2 notes that development in this location will be limited to 'the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.' Similarly, it is noted that Policy SP2 does not consider Wenvoe to be an appropriate location for ''substantial additional growth''.

5.31 Barratt Redrow object to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified.

5.32 First of all, the Deposit Plan acknowledges that it performs a similar function to the Primary Settlements located within the Strategic Growth Area and it is described as one of the 'sustainable communities' in The Vale of Glamorgan Key Characteristics section, as noted previously in Section 3.

5.33 Likewise, the site benefits from excellent accessibility the local public transport network, active travel routes and local services. These characteristics fully accord with Welsh Government's strategic objectives and emphasise the fact that Swn Y Coed constitutes an appropriate location for future housing.

5.34 With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge''. Barratt Redrow do not consider this to be sufficient justification to discount the site from allocation as there would be limited impact on BMW agricultural land arising from the development of Swn Y Coed.

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of

PPW 12 as the lowest grade available.
5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.
Policy SP4 - Placemaking
5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.
5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.
5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.
5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.
5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
Policy PGD1 – Creating Well Designed and Inclusive Places
5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist

and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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Unsustainable Location & Poor Connectivity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.
• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.
• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.
• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.
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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
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• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential

that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply
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• HG1 (8) St Athan - Clive Road, St Athan

Policy HG3 – Housing Led Redevelopment Opportunity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is

welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).
• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4).Finally, the Council's own Viability

Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.
• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.
• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:
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Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:
i. Space heating demand less than or equal to 40kWh/m2/year;
ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.
• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
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Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established 'defensible' limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be 'largely shielded from view by woodland blocks/strips'.
• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for 'infilling' the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.
• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
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Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and

street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute “visitor pressure” or an “adverse impact” on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan’s ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
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Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.
• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
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MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources

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• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
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Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
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CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the Council's vision for the VoG.
• 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
• 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
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6. CONCLUSION
• Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.
• Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swn Y Coed, are necessary to ensure the RLDP is able to effectively meet
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Barratt Redrow welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Barratt Redrow support the requirements for affordable housing in new development. In its current form the proposed policies SP7 and SP8 lack sufficient flexibility for site specific circumstances and physical constraints which may impact upon delivery. This inevitably creates uncertainty for a number of sites, where the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities.
• From a planning perspective it is also important to recognise the additional benefits the site (Candidate Site Ref No. 437) could provide in accommodating the increased housing need generated by the suggested 15% flexibility allowance within a highly sustainable location. The principles of which clearly align with the Council's aspirations and would maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3ch

7078 Support

Document Element: CI1 – OPEN SPACE PROVISION

Respondent: Barratt Redrow Homes [2669]

Agent: Highlight Planning

Summary:

Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at

adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too

blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."
The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.
5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no

recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and

• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to “boom” or “recession” factors impacting on affordability are nevertheless able to “catch-up” later on – 80% of the gap at the age of 30 is “caught-up” by the age of 40. This finding supports the resumption of long-term household formation trends.

In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.

That concern is reinforced by the updated Welsh Government evidence published after the RLDP’s preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.

The updated 2022-based household projections point in the same direction. Welsh Government’s latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or “business as usual” response for the Vale. It points the other way.

This sits uncomfortably with the Council’s own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.

The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.

There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.

A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.

The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.

The Council’s own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a

1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly,

Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.

Policy SP6 – Flexibility, housing land supply and trajectory Position: Object

Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.

The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.

In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.

The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.

The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.

Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.

The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.

There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.

In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.

Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part

Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from

the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.
That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.
There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.
The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.
In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.
Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.
The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of

the housing response.
8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part
Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.
The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;
• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.
The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is

expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.

Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object

Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.

There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.

A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.

Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.

In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.

Policy CI1 – Open Space Provision

Position: Support in principle / Object in part

Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.

The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.

There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of

assessment.
Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.

Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most

flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.

As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.

Appendix 2 – Summary of Assessment

We comment on the Council's Summary of Assessment as follows:

• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.

• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.

• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.

• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.

• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.

• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.

• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.

• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.

• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.

Suitability for Allocation and Key Benefits

For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.

The proposed development of the site would deliver the following key benefits:

• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;

• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;

• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;

• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;

• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;

• Economic benefits – including that the proposed development is expected to:

o Support the employment of 434 people;

o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.

It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.

Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.

I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to

contact us.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7079 Object

Document Element: CI1 – OPEN SPACE PROVISION
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.
There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.

Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need

and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.

In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.

Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.

Policy SP6 – Housing Requirement Position: Object

Barratt Redrow objects to Policy SP6.

Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.

PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:

"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."

The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:

"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.

5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.

5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."

Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:

• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;

• Does not actively seek to address the area's ageing demographic;

• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;

• Does not seek to leverage any of the investment into the region through the CCR City Deal;

• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and

• During the period considered, many people were prevented from forming new households due to a lack of mortgage

finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to “boom” or “recession” factors impacting on affordability are nevertheless able to “catch-up” later on – 80% of the gap at the age of 30 is “caught-up” by the age of 40. This finding supports the resumption of long-term household formation trends.

In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.

That concern is reinforced by the updated Welsh Government evidence published after the RLDP’s preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.

The updated 2022-based household projections point in the same direction. Welsh Government’s latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or “business as usual” response for the Vale. It points the other way.

This sits uncomfortably with the Council’s own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.

The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.

There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.

A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.

The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.

The Council’s own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a

1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader

and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.

Policy SP6 – Flexibility, housing land supply and trajectory Position: Object

Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.

The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.

In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.

The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.

The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.

Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.

The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.

There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.

In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.

Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part

Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.

The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on

the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.

That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.

There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.

The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.

In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.

Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part

Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.

The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.

In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.

8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However,

there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.
The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;
• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.
The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply.

In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.

Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object

Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.

There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.

A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.

Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.

In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.

Policy CI1 – Open Space Provision

Position: Support in principle / Object in part

Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.

The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.

There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.

Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be

addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.

Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available

survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.

As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.

Appendix 2 – Summary of Assessment

We comment on the Council's Summary of Assessment as follows:

• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.

• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.

• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.

• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.

• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.

• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.

• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.

• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.

• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.

Suitability for Allocation and Key Benefits

For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.

The proposed development of the site would deliver the following key benefits:

• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;

• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;

• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;

• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;

• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;

• Economic benefits – including that the proposed development is expected to:

o Support the employment of 434 people;

o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.

It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.

Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.

I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

Amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7111 Comment

Document Element: CI1 – OPEN SPACE PROVISION
Respondent: Barratt Redrow Homes [2669]
Agent: Turley

Summary:

The wording and supporting text must allow greater flexibility to be applied to the open space standards. It is also important that the type and range of provision is reflective of local context/needs. This is reflected in para 6.233 but the policy should also be amended to reflect this directly.
We would question the need for a standalone 'Open Space Strategy' or statement and the policy should be amended to reflect this.

Full text:

Policy SP1 - Sustainable Growth Strategy
Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.
It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.
In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"
Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be concentrated is supported.

Policy SP2 - Settlement Hierarchy
The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable. As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Policy SP4 - Placemaking

We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.
The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses... ' or to be developed at 'high densities... and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.
Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Policy PGDl - Creating Well Designed and Inclusive Places
There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what

is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy

requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy CII - Open Space Provision
The wording of Policy CII, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy CII should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy CII requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities

Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

Amend policy wording.

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7112 Object

Document Element: CI1 – OPEN SPACE PROVISION
Respondent: Barratt Redrow Homes [2669]
Agent: Turley

Summary:

The proposed 62.2sqm per dwelling requirement is overly prescriptive and not aligned with FiT's methodology. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.

Full text:

Policy SP1 - Sustainable Growth Strategy
Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the

7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.
It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.
In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"
Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be concentrated is supported.

Policy SP2 - Settlement Hierarchy
The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable. As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Policy SP4 - Placemaking
We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.
The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses... ' or to be developed at 'high densities... and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.
Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Policy PGDl - Creating Well Designed and Inclusive Places
There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock

Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

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Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

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The wording of Policy Cll, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy Cll should also be amended to reference this directly.

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It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

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Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning

approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

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Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7113 Support

Document Element: CI1 – OPEN SPACE PROVISION

Respondent: Barratt Redrow Homes [2669]

Agent: Turley

Summary:

The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Full text:

Policy SP1 - Sustainable Growth Strategy
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It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.
In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"
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Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has

been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the

policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy CII - Open Space Provision
The wording of Policy CII, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy CII should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy CII requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7196 Support

Document Element: CI1 – OPEN SPACE PROVISION
Respondent: H Jones, L Sungur and P John [3741]
Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

Provision of open space in residential developments is supported.

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis. Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

The inclusion of the site within the settlement boundary is logical especially when viewed in the context of the linear

settlement of Fferm Goch. In addition the site is further suited to development allocation as the northern and southern boundaries are built up and the main road runs along the eastern boundary. A flexible approach is encouraged with regard to the delivery of the dwellings in relation to a variety of factors and policy provisions including the housing needs across the Vale, the limit on numbers of rural affordable led sites in minor rural settlements, viability implications relating to obligations/carbon Zero and sustainability obligations and the potential to extend the allocation if the need for homes requires.

The 3 land owners remain committed to this development and local developers are waiting to deliver the allocation.

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

The test of soundness for a Local Development Plan (LDP) is a critical component of the planning process to ensure that the plan is prepared in accordance with legal and procedural
requirements. It involves demonstrating that the plan is 'sound' based on three tests set out by the Welsh Government in the Development Plans Manual (Edition 3). These tests have therefore been considered in our representation, the tests include:

• Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)
• Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
• Test 3: Will the plan deliver (i.e. is it likely to be effective?)

SP1 – Sustainable Growth Strategy

The promotion of small scale affordable housing led development outside of the SGA, as proposed by SP1 is important as this provides essential affordable and market homes in the rural locations of the Vale as well as the SGA. Their provision is critical in meeting the area's housing needs, particularly affordable dwellings and supporting rural community stability, and ensuring that all parts of the Vale remain a place where people of all incomes are able to live and thrive during the plan period to 2036 and beyond.

The essence of Policy SP1 is supported, however it is well documented that there is a backlog in delivery of affordable homes and the need for affordable housing in the Vale is exacerbated by the high prevalence of single person households plus households comprising couples with no children, The Vale also has one of the highest affordability pressures in Wales. As stated in the 2023 Local Housing Market Assessment (LHMA) for the Vale of Glamorgan , the median house price in the Vale is around 8 times the median household income, well above the affordability threshold of 4.5 to 5 times household income for borrowing purposes. Private rents have also risen sharply in the area, commonly placing them out of reach for many low-to-middle income households. All of the above place further pressure on the need to deliver affordable homes in the locality.

The LHMA identifies a need for 1,075 affordable homes per year over the next 5 years based on principal projections (or 1,114 based on the RLDP projections). As mentioned previously past delivery rates fall significantly short and therefore a backlog is present, however despite the reported backlog the RLDP only proposes 3,070 (205/annum) affordable dwellings over the plan period to 2036. Despite the growth strategy of policy SP1 and allocations made through the RLDP, the figure of proposed affordable dwelling numbers is concerning as it falls significantly short of the demand evidenced within the most recent evidence of LHMA of 2023.

The housing figures quoted in SP1 indicate 7,890 dwellings (including the 3,070 affordable dwellings) to 2036, however these figures overall are inadequate over the plan period when considered against the 2022 WG household projections. The 2022-based household projections provide an indication of the future number of households, and their composition, based on population projections and assumptions about households from recent censuses. The vale of Glamorgan demonstrates an increase of almost 12% in the number of households between mid-2022 and mid-2032; note this is the highest percentage increase by Local authority in Wales and way above the average for Wales as a whole (that stands at around 7% increase). The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both open market, but particularly Affordable) development across the Vale.

Without targeted allocations outside of the SGA, as outlined in Policy SP1, the gap described above will continue to widen, forcing more residents to leave the area and weakening community cohesion.

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the RLDP the supporting text of Policy SP2 states:
'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

sustainable growth. Locating affordable-led developments in areas with existing infrastructure such as primary schools will reduce car dependency, lower carbon emissions, and contribute to the Council's climate change commitments.

Considering the above, the limit on small scale rural affordable housing led developments (RAHLD) to 25 for these settlements is questioned and further flexibility recommended on a case by case basis. It is understood the limit on numbers was imposed due to the existing scale of the settlement in which the RAHLD are located, however those allocations will only likely deliver at 50% affordable and therefore only provide 12.5 (or 13) affordable units as a maximum (note Fferm Goch would provide 11 affordable dwellings on current figures of 22 total dwellings). Given the concerns raised in response to Policy SP1 there remains an issue of whether the numbers proposed in the RLDP can meet the demonstrable need for affordable homes and if there is scope on a RAHLD to sensitively increase unit numbers without any material harm then the policy should be flexible to accommodate this.

Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the range of facilities and services provided in these settlements. It is also supported that these settlements are able to provide affordable led residential development of up to 50 dwellings (delivering 25 affordable units). However the provision of an increased number of units in the Primary Non SGA settlements must not be at the expense of a wider number of smaller rural sites with the ability to sustain smaller communities across the Vale, especially given the shortfall in numbers as outlined above.

PGD2 – Residential Development Densities

The best use of finite land is set out in PPW and consistent with the setting of the densities as prescribed in policy PGD2. The policy is considered to meet the 3 tests of soundness.

The approach of policy PGD2 is also supported through the proposed density of the site North of Westwinds business park, Fferm Goch in HG4 (4). This allocation that proposes to provide a density of just over 30/ha within Fferm Goch, a minor rural settlement.

SP6 – Housing Requirement

Affordable housing forms an important part of the housing requirement figures of Policy SP6. Whilst the total 122 dwellings proposed under policy HG4 is a relatively small contribution to the overall figures it provides important spatial distribution of homes across the Vale within the rural area.

Given the concerns raised with regard to Policy SP1 there is fear that the affordable housing numbers will not be sufficient to meet need. The site north of Westwinds business park, Fferm Goch has the ability to expand to the south (as per the CS Ref 398) in order to accommodate additional dwellings (both market and affordable dwellings in order to sustain the viability of the site).

SP7 – Affordable Housing Provision

In accordance with Policy SP7 the allocated site HG4(4) at Fferm Goch provides a range of tenures, types and sizes in response to the LHMA, waiting list data and Older persons housing strategy in order to provide for 11 dwelling units and contributing toward the 3,070 affordable requirement to 2036. Changes in the household composition mean more single person and small homes are required, plus older person accommodation for those wishing to downsize and stay in the area.

Please see comments for Policy SP1 / Policy SP2 above regards concern over the proposed housing numbers and supply of affordable homes against demand - this therefore brings the Deliverability of the plan in to question (Test of

Soundness 3).

SP8 – Affordable Housing Requirements

Policy SP8 is supported in so far as contributing much needed affordable housing development commensurate with the size of the settlement in which it sits. We are encourage to see reference to the provision of affordable housing to be negotiated on a site by site basis considering evidenced viability fo the development.

The affordable dwellings proposed foster stability in rural areas by allowing a range of households (from single person to growing families) to stay in their local area.

Policy SP8 states 40% affordable for those developments in primary and minor settlements outside of the SGA yet 50% requirement on affordable housing led allocations in minor rural settlements (also outside of the SGA). This appears inconsistent and penalising those smaller rural sites that will already be more delicately balanced in viability terms by virtue of their limited size of 25 units. Further viability issues covered in other policies (such as SP20, relating to biodiversity, Net Zero and sustainability credentials must (with the required evidence submitted and assessed by the council as stated in Policy SP8) be flexibly reviewed to ensure sites are viable and deliverable as recognised by the Council, there is a danger the stringent requirements, especially for smaller sites, could render those sites unviable in the current climate with rising build costs.

HG4 – Rural affordable housing led sites

The allocation of land north of West Winds Business Park under policy HG4(4) for rural affordable housing led development of 22 units is strongly supported. Then allocation will assist in delivering homes in the rural Vale and contribute to the important stability to the settlement of Fferm Goch to 2036.

The extension of the settlement limit including the site north of West Winds Business Park is supported. The site provides an obvious infill to the small break in the built up area to both the north and south of the site, with the main road running to the eastern boundary of the site.

The inclusion of the site within the settlement of Fferm Goch is logical and in harmony with the existing linear settlement.

The proposal supports the aims of the Local Development Plan and the Welsh Government's commitment to increasing affordable housing supply. By providing for affordable led allocations the policy aligns with the Well-being of Future Generations (Wales) Act 2015 in aiming to promote a healthier, more equal, and cohesive community.

There is concern however surrounding the number of dwellings proposed and if the Plan seeks sufficient dwellings and affordable provision given the predicted need to 2036 shown in the LMHA.

SP13 – Community infrastructure and planning obligations

Policy SP13 demonstrates the importance of community infrastructure in sustaining both the residents well being and economic growth of an area. See also the response to Policy SP2 that refers to the allocation of housing in the rural areas specifically supporting those settlements with local primary school provision.

The viability of developments however must not be compromised in order to ensure delivery of the plan. To see in Policy SP13 that 'development viability' is recognised as a key factor in delivering community infrastructure under planning obligations, is supported. It is recommended that this recognition is replicated in other policies of the LDP in order that the third Test of soundness can be fully met; Deliverability – ensuring the plan is likely to be effective). See comments in relation to Policies SP8/CC1/SP16/CI1.

CI1 – Open Space Provision

Provision of open space in residential developments is supported. HG4(4) promotes open space within the draft allocation.

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

The provisions of SP16 are generally supported as practical measures to ensure important sustainable development is achieved.

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

Provision of Green Infrastructure in residential, and all developments is supported.

HG4(4) retains and enhances existing and will promote green infrastructure on the draft allocation.

The viability of developments however must not be compromised through green infrastructure provision - in order to ensure delivery of the plan. The 'development viability' should therefore be recognised as a key factor in delivering Green Infrastructure. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

Fferm Goch is one of the settlements that remains fully within and covered by the Upper and Lower Thaw Valley Special Landscape Area (SLA). It is noted that in such settlements, while there have been amendments to the identified settlement boundary (inclusion of HG4 (4) rural affordable led housing allocation) this has not affected the SLA designation in these areas. (Background Paper 45; Paragraph 1.16 refers).

The location of the small allocated site HG4(4) is nestled within the settlement of Fferm Goch. It is built up on both the northern and southern boundaries, with the main road running along the eastern boundary. There is no unacceptable harm to the SLA of the Upper and Lower Thaw valley.

The allocation of the site for residential development does not give rise to unacceptable harm to the special qualities and characteristics of the SLA, based on LANDMAP information, continues to be preserved.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

7197 Comment

Document Element: CI1 – OPEN SPACE PROVISION
Respondent: H Jones, L Sungur and P John [3741]
Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space.

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis. Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

The inclusion of the site within the settlement boundary is logical especially when viewed in the context of the linear settlement of Fferm Goch. In addition the site is further suited to development allocation as the northern and southern boundaries are built up and the main road runs along the eastern boundary. A flexible approach is encouraged with regard to the delivery of the dwellings in relation to a variety of factors and policy provisions including the housing needs across the Vale, the limit on numbers of rural affordable led sites in minor rural settlements, viability implications relating to obligations/carbon Zero and sustainability obligations and the potential to extend the allocation if the need for homes requires.

The 3 land owners remain committed to this development and local developers are waiting to deliver the allocation.

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

The test of soundness for a Local Development Plan (LDP) is a critical component of the planning process to ensure that the plan is prepared in accordance with legal and procedural
requirements. It involves demonstrating that the plan is 'sound' based on three tests set out by the Welsh Government in the Development Plans Manual (Edition 3). These tests have therefore been considered in our representation, the tests include:

• Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)
• Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
• Test 3: Will the plan deliver (i.e. is it likely to be effective?)

SP1 – Sustainable Growth Strategy

The promotion of small scale affordable housing led development outside of the SGA, as proposed by SP1 is important as this provides essential affordable and market homes in the rural locations of the Vale as well as the SGA. Their provision is critical in meeting the area's housing needs, particularly affordable dwellings and supporting rural community stability, and ensuring that all parts of the Vale remain a place where people of all incomes are able to live and thrive during the plan period to 2036 and beyond.

The essence of Policy SP1 is supported, however it is well documented that there is a backlog in delivery of affordable homes and the need for affordable housing in the Vale is exacerbated by the high prevalence of single person households plus households comprising couples with no children, The Vale also has one of the highest affordability pressures in Wales. As stated in the 2023 Local Housing Market Assessment (LHMA) for the Vale of Glamorgan , the median house price in the Vale is around 8 times the median household income, well above the affordability threshold of 4.5 to 5 times household income for borrowing purposes. Private rents have also risen sharply in the area, commonly placing them out of reach for many low-to-middle income households. All of the above place further pressure on the need to deliver affordable homes in the locality.

The LHMA identifies a need for 1,075 affordable homes per year over the next 5 years based on principal projections (or 1,114 based on the RLDP projections). As mentioned previously past delivery rates fall significantly short and therefore a backlog is present, however despite the reported backlog the RLDP only proposes 3,070 (205/annum) affordable dwellings over the plan period to 2036. Despite the growth strategy of policy SP1 and allocations made through the RLDP, the figure of proposed affordable dwelling numbers is concerning as it falls significantly short of the demand evidenced within the most recent evidence of LHMA of 2023.

The housing figures quoted in SP1 indicate 7,890 dwellings (including the 3,070 affordable dwellings) to 2036, however these figures overall are inadequate over the plan period when considered against the 2022 WG household projections. The 2022-based household projections provide an indication of the future number of households, and their composition, based on population projections and assumptions about households from recent censuses. The vale of Glamorgan demonstrates an increase of almost 12% in the number of households between mid-2022 and mid-2032; note this is the highest percentage increase by Local authority in Wales and way above the average for Wales as a whole (that stands at around 7% increase). The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both open market, but particularly Affordable) development across the Vale.

Without targeted allocations outside of the SGA, as outlined in Policy SP1, the gap described above will continue to widen, forcing more residents to leave the area and weakening community cohesion.

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the
RLDP the supporting text of Policy SP2 states:
'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that

serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

sustainable growth. Locating affordable-led developments in areas with existing infrastructure such as primary schools will reduce car dependency, lower carbon emissions, and contribute to the Council's climate change commitments.

Considering the above, the limit on small scale rural affordable housing led developments (RAHLD) to 25 for these settlements is questioned and further flexibility recommended on a case by case basis. It is understood the limit on numbers was imposed due to the existing scale of the settlement in which the RAHLD are located, however those allocations will only likely deliver at 50% affordable and therefore only provide 12.5 (or 13) affordable units as a maximum (note Fferm Goch would provide 11 affordable dwellings on current figures of 22 total dwellings). Given the concerns raised in response to Policy SP1 there remains an issue of whether the numbers proposed in the RLDP can meet the demonstrable need for affordable homes and if there is scope on a RAHLD to sensitively increase unit numbers without any material harm then the policy should be flexible to accommodate this.

Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the range of facilities and services provided in these settlements. It is also supported that these settlements are able to provide affordable led residential development of up to 50 dwellings (delivering 25 affordable units). However the provision of an increased number of units in the Primary Non SGA settlements must not be at the expense of a wider number of smaller rural sites with the ability to sustain smaller communities across the Vale, especially given the shortfall in numbers as outlined above.

PGD2 – Residential Development Densities

The best use of finite land is set out in PPW and consistent with the setting of the densities as prescribed in policy PGD2. The policy is considered to meet the 3 tests of soundness.

The approach of policy PGD2 is also supported through the proposed density of the site North of Westwinds business park, Fferm Goch in HG4 (4). This allocation that proposes to provide a density of just over 30/ha within Fferm Goch, a minor rural settlement.

SP6 – Housing Requirement

Affordable housing forms an important part of the housing requirement figures of Policy SP6. Whilst the total 122 dwellings proposed under policy HG4 is a relatively small contribution to the overall figures it provides important spatial distribution of homes across the Vale within the rural area.

Given the concerns raised with regard to Policy SP1 there is fear that the affordable housing numbers will not be sufficient to meet need. The site north of Westwinds business park, Fferm Goch has the ability to expand to the south (as per the CS Ref 398) in order to accommodate additional dwellings (both market and affordable dwellings in order to sustain the viability of the site).

SP7 – Affordable Housing Provision

In accordance with Policy SP7 the allocated site HG4(4) at Fferm Goch provides a range of tenures, types and sizes in response to the LHMA, waiting list data and Older persons housing strategy in order to provide for 11 dwelling units and contributing toward the 3,070 affordable requirement to 2036. Changes in the household composition mean more single person and small homes are required, plus older person accommodation for those wishing to downsize and stay in the area.

Please see comments for Policy SP1 / Policy SP2 above regards concern over the proposed housing numbers and supply of affordable homes against demand - this therefore brings the Deliverability of the plan in to question (Test of Soundness 3).

SP8 – Affordable Housing Requirements

Policy SP8 is supported in so far as contributing much needed affordable housing development commensurate with the size of the settlement in which it sits. We are encourage to see reference to the provision of affordable housing to be

negotiated on a site by site basis considering evidenced viability fo the development.

The affordable dwellings proposed foster stability in rural areas by allowing a range of households (from single person to growing families) to stay in their local area.

Policy SP8 states 40% affordable for those developments in primary and minor settlements outside of the SGA yet 50% requirement on affordable housing led allocations in minor rural settlements (also outside of the SGA). This appears inconsistent and penalising those smaller rural sites that will already be more delicately balanced in viability terms by virtue of their limited size of 25 units. Further viability issues covered in other policies (such as SP20, relating to biodiversity, Net Zero and sustainability credentials must (with the required evidence submitted and assessed by the council as stated in Policy SP8) be flexibly reviewed to ensure sites are viable and deliverable as recognised by the Council, there is a danger the stringent requirements, especially for smaller sites, could render those sites unviable in the current climate with rising build costs.

HG4 – Rural affordable housing led sites

The allocation of land north of West Winds Business Park under policy HG4(4) for rural affordable housing led development of 22 units is strongly supported. Then allocation will assist in delivering homes in the rural Vale and contribute to the important stability to the settlement of Fferm Goch to 2036.

The extension of the settlement limit including the site north of West Winds Business Park is supported. The site provides an obvious infill to the small break in the built up area to both the north and south of the site, with the main road running to the eastern boundary of the site.

The inclusion of the site within the settlement of Fferm Goch is logical and in harmony with the existing linear settlement.

The proposal supports the aims of the Local Development Plan and the Welsh Government's commitment to increasing affordable housing supply. By providing for affordable led allocations the policy aligns with the Well-being of Future Generations (Wales) Act 2015 in aiming to promote a healthier, more equal, and cohesive community.

There is concern however surrounding the number of dwellings proposed and if the Plan seeks sufficient dwellings and affordable provision given the predicted need to 2036 shown in the LMHA.

SP13 – Community infrastructure and planning obligations

Policy SP13 demonstrates the importance of community infrastructure in sustaining both the residents well being and economic growth of an area. See also the response to Policy SP2 that refers to the allocation of housing in the rural areas specifically supporting those settlements with local primary school provision.

The viability of developments however must not be compromised in order to ensure delivery of the plan. To see in Policy SP13 that 'development viability' is recognised as a key factor in delivering community infrastructure under planning obligations, is supported. It is recommended that this recognition is replicated in other policies of the LDP in order that the third Test of soundness can be fully met; Deliverability – ensuring the plan is likely to be effective). See comments in relation to Policies SP8/CC1/SP16/CI1.

CI1 – Open Space Provision

Provision of open space in residential developments is supported. HG4(4) promotes open space within the draft allocation.

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

The provisions of SP16 are generally supported as practical measures to ensure important sustainable development is achieved.

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

Provision of Green Infrastructure in residential, and all developments is supported.

HG4(4) retains and enhances existing and will promote green infrastructure on the draft allocation.

The viability of developments however must not be compromised through green infrastructure provision - in order to ensure delivery of the plan. The 'development viability' should therefore be recognised as a key factor in delivering Green Infrastructure. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

Fferm Goch is one of the settlements that remains fully within and covered by the Upper and Lower Thaw Valley Special Landscape Area (SLA). It is noted that in such settlements, while there have been amendments to the identified settlement boundary (inclusion of HG4 (4) rural affordable led housing allocation) this has not affected the SLA designation in these areas. (Background Paper 45; Paragraph 1.16 refers).

The location of the small allocated site HG4(4) is nestled within the settlement of Fferm Goch. It is built up on both the northern and southern boundaries, with the main road running along the eastern boundary. There is no unacceptable harm to the SLA of the Upper and Lower Thaw valley.

The allocation of the site for residential development does not give rise to unacceptable harm to the special qualities and characteristics of the SLA, based on LANDMAP information, continues to be preserved.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

5403 Comment

Document Element: CI2 - PROTECTION OF EXISTING OPEN SPACES

Respondent: Ms Lucie Taylor [2506]

Summary:

Social Farms & Gardens support the policy principles but note some contemporary considerations are missing. Proposals for development on open space within settlements are only permitted if the remaining open space is adequate for local needs and the site lacks significant recreational, social, food growing, visual, or green infrastructure value. Open spaces are vital for community character, recreation, social cohesion, and well-being. Policy CI2 applies to all open spaces within settlement boundaries, covering various typologies including parks, allotments, sports facilities, and informal greenspaces, especially where there is an open space deficit.

Full text:

We support the principles of this policy by there are some important more contemporary considerations missing for the text.
Proposals for development on areas of open space within settlements will only be permitted where:
1. The amount of open space (broken down by typology) remaining in the neighbourhood would still be adequate to serve local needs; and
2. The site has no significant value as a recreational resource, a source of social or food growing provision, or as an area of visual amenity a green infrastructure asset.
6.240 Public open spaces are an important part of the distinctive character of communities within the Vale, providing areas for a range of recreational activities, the provision of food production, social cohesion, as well as making areas attractive to live, and supporting physical and mental well-being. Increasingly, open spaces within existing settlements are under pressure from development and it is important that, where appropriate, those open spaces that have significant social, recreational or visual amenity value are safeguarded, particularly in areas where there is a deficit of open space when compared to the FIT standards for open space provision.
6.241 Policy CI2 applies to all open spaces on unallocated sites within a defined settlement boundary. The open space typologies to which it applies are defined in TAN 16: Sport, Recreation and Open Space, with this including formal facilities such as public parks and gardens, allotments, outdoor sports facilities and provision for children and young people, as well as more informal open space such as community growing areas, amenity greenspace and natural and semi natural greenspace.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5678 Object

Document Element: CI2 - PROTECTION OF EXISTING OPEN SPACES

Respondent: Mr David Entwistle [3264]

Summary:

The points do not offer enough protection of existing open space and do not actively discourage them being used for development enough. Stronger protections are required for our existing open space within the Vale.

Full text:

The points do not offer enough protection of existing open space and do not actively discourage them being used for development enough. Stronger protections are required for our existing open space within the Vale.

Change suggested by respondent:

There should be stronger and more stringent limitations on development of open spaces. Residents views should be directly taken into account as opposed to purely the views of professional planners and ecologists. Whilst a hedgerow/field may not from an ecological point of view offer good habitat for a range of species it may provide oversized joy to local residents and may be the only green space visible from their house for example. There should be more quantifiable points such as: if the space holds more than x amount of species or provides a habitat for certain key species it should be excused from development.

Sound: No

Attachments: None

6729 Comment

Document Element: CI2 - PROTECTION OF EXISTING OPEN SPACES

Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning
guidance (SPG) proposed. We are keen to ensure that these SPG's are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are
involved in the development of some of these. The content and application of the SPG's will be fundamental to the effectiveness of several of the policies identified in the
deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community
amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient
communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: "The Local Development Plan will support resilient and sustainable
local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part
of sustainable growth."

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local
diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

"Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other
opportunities for local food production as part of multifunctional green infrastructure."

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their
proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative
impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

6.54 We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live
full, productive and prosperous lives.'

6.60 We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid
HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to
ensure Developers submit a quality HIA and implement the conclusions.

6.61 Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

6.62 Wales Health Impact Assessment Support Unit has recently released guidance on HIA - see https://phwwhocc.co.uk/whiasu/ for more information and toolkits to ensure most up to date is in use.

6.63 Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the community..'.

6.65 Suggestion to change wording from 'encouraged' to 'expected' for example:
Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement
for HIA will assist with this expectation.

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference “enhancements to leisure, sport and recreation spaces”. Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation. It is recommended that the Key Site schedules include minimum on-site provision standards and delivery
phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population
growth.

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail
centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer
supply chains. This limits opportunities for strengthening local food economies.
It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for ‘local affordable food’ outlined in SP5.

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach.”

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to
consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and
Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: “Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food
infrastructure within walking distance of new residential areas.” This addresses diet related health inequalities, encourages healthier communities and aligns with HIA
guidance.

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply
chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable
agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models.

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses - to include the following wording: “Rural diversification proposals that support agro-ecological farming, sustainable local food production,
community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations.”

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel
Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022
01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing
flooding and making use more comfortable during hot weather (such as shading from trees). We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

SP13 Community infrastructure and planning obligations:

We want to take this opportunity to highlight the challenges that population growth places on healthcare
services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure. Please refer to the information provided as part of the background evidence paper titled 'BP37
Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within
existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new
developments to take forward its strategic objectives.

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space Assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres. Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.”
There is no reference to the expectation that local communities are consulted in relation to the development of community facilities. We would like to see a
requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and
challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities
that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales’ push for local supply resilience, this is a major opportunity gap. Consider including the following wording:

“Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains.” This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or
urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: “Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing.”

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food
production, short supply chains or sustainable farming practices.
Consider including the following wording: “Development proposals should encourage short supply chains, low-carbon farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives.”

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

4951 Object

Document Element: Land south of the railway,

Respondent: Dr Tim Render [3016]

Summary:

The scale of housing development proposed for St Athan is excessive and spoils the nature of the heritage coast. Use of this site would breach the policy on the coast set out in the plan.

Full text:

The scale of housing development proposed for St Athan is excessive and spoils the nature of the heritage coast. Use of this site would breach the policy on the coast set out in the plan.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6124 Object

Document Element: Land south of the railway,

Respondent: Ms Ann Barnaby [1702]

Summary:

This plot is on a bad bend of the B4265 - safe access to site would be dangerous - and yet another allocation to many in this area. Full consideration to the over development of St Athan should be a separate discussion point! Together with the wider impacts to infrastructure as the B4265 is a major route to Barry, Cardiff and beyond.

Full text:

This plot is on a bad bend of the B4265 - safe access to site would be dangerous - and yet another allocation to many in this area. Full consideration to the over development of St Athan should be a separate discussion point! Together with the wider impacts to infrastructure as the B4265 is a major route to Barry, Cardiff and beyond.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6136 Comment

Document Element: Land south of the railway,

Respondent: Ms Ann Barnaby [1702]

Summary:

I agree with planners assessment - the location of this site on the B4265 would cause significant infrastructure safety issues

Full text:

I agree with planners assessment - the location of this site on the B4265 would cause significant infrastructure safety issues

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6637 Comment

Document Element: St Athan Primary School, St

Respondent: Mr Andrew Street [3444]

Summary:

The proposed expansion of St Athan Primary School lacks a guaranteed timeline for when these facilities will be operational relative to house completions.

Full text:

Representation on the Vale of Glamorgan Deposit RLDP 2021–2036

Specific Policy/Site Objection:
• Policy SP4.4: Land at Church Farm, St Athan
• Policy SP4.5: Land to the West of St Athan
• Clive Road (Additional Allocation)
• Policy EMP2: MOD St Athan / Bro Tathan

Status: Unsound

1. Introduction

I wish to formally object to the allocation of the above sites and the broader designation of St Athan as a "Primary Settlement" for high-density growth within the Replacement Local Development Plan (RLDP). This allocation fails the Test of Soundness regarding Consistency (with national climate goals) and Effectiveness (deliverability of infrastructure).

2. Failure of Sustainable Transport (Policy SP7 & SP10)

The RLDP identifies St Athan as a "Strategic Hub," yet it remains the only primary settlement in the Vale of Glamorgan without a direct rail link. Relying on the "Active Travel" aspirations of Policy SP10 is unrealistic for a community where the majority of residents commute to Cardiff, Bridgend, or Barry.

The proposed density at the above sites will inevitably lead to an unsustainable increase in private car journeys on the B4265, specifically at the Gileston Road junction and Weycock Cross, which are already at or near capacity.

Concrete infrastructure is needed to be in place prior to any development of the land. Often intentions of infrastructure are not progressed. In addition where infrastructure is not in place prior to housing many commuters will become accustomed to travel by car and wont switch to public transport. It is difficult to see how developments work with Future Wales: The National Plan 2040

Active travel should look at linking key destinations and with the western vale being spread over longer distances more effort should be given to linking population centres with separated bicycle paths and wide accessible pavements. Shared bike / foot paths are inherently dangerous not allowing the safe use of wheelchairs and prams and sufficient use for children and dog walkers. Cycling should not have to stop at every intersection which creates visibility black spots by the way they turn away from traffic.

With current planned housing and that of additional housing in the LDP creating over 1,000 new homes and with each household having 1-2 cars per household this will add significant additional numbers of journeys on already poor road infrastructure. The vale lacks sufficient north / south routes pushing vehicles towards Weycock Cross in Barry which will have its own traffic issues or via Cowbridge with small country lanes. I personally worked in Cowbridge travelling from St Athan where buses would take over 1 hour 10 minutes and even then not arriving in time to start work. In contrast car travel would be 10 minutes or cycle would be 20 minutes but over dangerous roads.

Travel to Barry for meetings at peak times can take over 50 minutes from St Athan with significant delays leading to Weycock Cross and passed the secondary schools even before developments in the RLDP or existing planning. Public transport gets caught in the same traffic issues.

Access into St Athan is already dangerous from the war memorial with one near fatal accident already having taken place since the ‘improvements’ to the junction. Proposals for additional access from B4265 onto developed land would be on a hill with poor visibility and around a blind bend. Currently there is poor visibility leaving St Athan due to the side by side two car exit blocking views in both directions along with more visibility issues looking westward due to traffic furniture and signage.

While Bro Tathan (Policy EMP2) provides jobs, there is no guarantee that the people moving into local developments will work there. If they commute elsewhere, the RLDP fails its own climate goals (Policy SP1) by creating a "commuter colony" rather than a sustainable community.

Reference Policy CI3 (New Community Facilities). The proposed expansion of St Athan Primary School lacks a guaranteed timeline for when these facilities will be operational relative to house completions. New access to the school under existing planning is only ‘proposed’ and existing access to the school via Rock Road is a poorly surfaced and narrow one way road but is
often ignored with traffic coming via Rectory Drive which has a ‘No entry except for access’ restriction but is not enforced causing large numbers of vehicles into residential areas not built for this type of activity.

Speeding is already a great concern in the village with the current level of vehicle traffic with little compliance with the 20mph speed limit and no enforcement.

3. Coalescence and Loss of Settlement Identity (Policy SSC1)

The scale of development proposed for Church Farm, in conjunction with Policy SP4.5 (Land West of St Athan), threatens the distinct character of the village. The erosion of the "Strategic Gap" between St Athan and Eglwys Brewis violates the principles of Policy SSC1 (Settlement Boundaries). This "urban creep" creates a continuous sprawl that permanently destroys the rural setting of the historic Church Farm and the village's unique sense of place.

St Athan should no longer be thought of as a village but as a small town with infrastructure to meet the growing demands of the population and lacks facilities that are given to surrounding towns such as fire / ambulance and police stations.

If the jobs at the Enterprise Zone (Aston Martin, Bro Tathan) do not match the demographic of the new residents, St Athan simply becomes a "dormitory" village, increasing the carbon footprint as people drive to Cardiff or Bridgend for work. In addition people will travel to St Athan from other areas should they be employed at the new commercial sites.

4. Infrastructure Lag and Healthcare Capacity (Policy CI3)

Under Policy CI3, development should only proceed where adequate community facilities exist or can be provided. Current primary healthcare services in St Athan and nearby Llantwit Major are already oversubscribed. The RLDP provides no "Triggers for Delivery" to ensure that new medical and educational facilities will be operational prior to the occupation of the hundreds of homes planned for the Church Farm site. This creates a significant risk to the wellbeing of both new and existing residents. Access to both village GP services are on a part time basis. With new dentist rules in Wales, this will increase the need for further travel around the area to meet simple check ups. With no A&E facilities in the county St Athan often falls between Cardiff and Bridgend hospitals and continued poor roads together with additional traffic gives greater
concern when emergencies happen.

5. Environmental and Biodiversity Impact (Policy SP5)

The Church Farm site consists of high-quality agricultural land and vital greenfield habitats. While Policy SP5 mandates a "Net Benefit for Biodiversity," the total loss of soil permeability and ancient hedgerow connectivity on a site of this scale cannot be mitigated by tokenistic landscaping. Once this valuable land is developed it is irretrievably lost for current and future generations. Currently there are red list species using the space like Yellowhammers and Skylarks. In addition there has been a collapse of invertebrate bio-mass over the last 40 years and personally seen since moving the area in 1980. Net Benefit for Biodiversity plans do not address any of these local and national concerns.

Land to the west of St Athan (SP4.5) This site consists of Grade 2 (Good) or 3a (Excellent) agricultural land. Under Planning Policy Wales (PPW) 12, such land should only be developed if there is an "overriding need" and no lower-grade land is available. The Vale of Glamorgan council has not sufficiently explored brownfield alternatives in the Barry Docks or the St Athan Enterprise Zone. The increased light pollution and "urban glow" will impact the rural character of the Western Vale.

The invertebrate charity Buglife shows that based on citizen science monitoring data, there has been a 75% to 79% decline in the abundance of flying insects in Wales between 2004 and 2023.

Natural Resources Wales also reported

• 79% Decrease in Flying Insects (2004–2023): Data from the "Bugs Matter" survey, which counts insect "splats" on vehicle number plates, recorded this 79% reduction in Wales, with 2023 showing further declines from previous years.
• Specific Invertebrate Declines: Moths, which are key pollinators, have seen an average decline of 43% in abundance since 1970.
• Widespread Biodiversity Loss: Welsh wildlife has decreased on average by 20% since 1994, and 18% of species in Wales are at risk of extinction.
• Habitats in Peril: Over the past 50 years, many insects have suffered declines of 65% to
70% in certain areas, particularly moths, butterflies, ladybirds, and ground beetles.
• Impact on Food Chain: Invertebrates that provide food for farmland birds have seen declines of 50-80%.

The cumulative impact of hard-standing surfaces also raises serious concerns regarding surface water runoff into the River Thaw catchment area. Significant surface flooding already takes place across the western Vale spilling onto roads causing travel disruption.

An increase in hard surfaces also increases ambient temperatures compared to grassland, woodland and other green spaces necessitating increased power use for cooling and comfortable living temperatures. Building practices can help mitigate this but only where this is incorporated into sustainable building rules.

Replacing green fields (which act as a natural sponge) with hundreds of roofs and driveways at Church Farm (SP4.4) and Land West of St Athan (SP4.5) will create a "funnel effect."

Dwr Cymru Welsh Water has previously noted concerns regarding the St Athan Wastewater Treatment Works. Proof is required that the current system can handle the RLDP's projected flow without increasing overflow events. Further

development risks "Combined Sewer Overflows" (CSOs) into local watercourses, which contradicts the Council's Nature Emergency declaration.

The Vale of Glamorgan Council requires a Sustainable Drainage Systems (SuDS) Approval Body (SAB) review. Attenuation ponds are often poorly maintained and can fail during the "1-in-100-year" storm events which are becoming more frequent.

6. Conclusion

The allocation of the above site policies are unsound. It promotes car-dependent growth in a rural location without the necessary infrastructure "trigger points" to protect the local environment or the B4265 road network.

Proposed Remedy: Reduce the housing density at the above sites and re-classify St Athan as a "Minor Rural Settlement" until such time as a dedicated rail link, suitable active travel infrastructure or high-frequency public transport other than rail is fully funded and scheduled for delivery.

Change suggested by respondent:

-

Sound: No

Attachments:

Redacted Representation Form - https://valeofglamorgan.oc2.uk/a/34q

6747 Comment

Document Element: Land south of the railway,

Respondent: Hallam Land Management [854]

Agent: Savills

Summary:

Hallam recognise that this site could be a suitable location for a Welsh Medium Secondary School and, as a principle, is agreeable to the safeguarding of land for the footbridge landing on the northern side of the railway line.
Paragraph 6.250 of the Deposit RLDP is clear that the delivery of a Welsh-Medium secondary school is in response to a regional / sub-regional demand rather than a local need as a result generated either by the development of Land West of St Athan or other emerging allocations within St Athan and it cannot be the case that Hallam are expected to make disproportionate contributions to either the delivery of the school or required active travel improvements just because they have control of the site or that it is next to the Key Site.

Full text:

1.1. Savills is instructed by Hallam Land ('Hallam') to respond to the consultation on the Deposit version of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').
1.2. Hallam is the strategic land arm of Henry Boot PLC and is one of the UK's most well established and successful land promoters. Hallam operates throughout England, Scotland and Wales from 7 regional offices working with landowners, developers, local authorities, communities and other parties to bring forward development opportunities. Hallam has been in operation since 1990, specialising in obtaining planning permission and delivering development larger schemes including new communities and urban extensions.
Background to Representations
1.3. The Preferred Strategy was published in November 2023. The Preferred Strategy identified "Land West of St Athan" and "Land South of the B4265, St Athan" (Site IDs 456 and 457) as one of five Key Sites in the Preferred Strategy. Both of these sites are under the control of Hallam and were submitted as part of the Call for Sites. A site-specific illustrative masterplan and policy wording were provided under Policy SP4 KS5 (Land to the West of St Athan).
1.4. Hallam submitted representations on the consultation on the Preferred Strategy. These representations were very much supportive of the identification of "Land to the West of St Athan" as a Key Site and the approach that was taken more generally taken in the Preferred Strategy.
Approach to Responding to Consultation
1.5. The VoG has published the Deposit version of the RLDP. The Deposit is the first version of the RLDP to include emerging allocations, and detailed development management policies, as well as a Proposals Map. It is accompanied by a substantial evidence base which includes various supporting technical documentation submitted as part of the promotion of the allocated sites.
1.6. Building upon the Preferred Strategy, the Deposit RLDP proposes to allocate Land to the West of St Athan as a Key Site. The site is identified under Policy HG1 KS5 (Land to the West of St Athan) as key mixed-use site with capacity for 600 new homes alongside new community and commercial facilities.
1.7. Hallam's representation to this consultation broadly splits into three separate sections:
• It offers general support for the housing requirement, growth strategy and settlement hierarchy. This is covered in Chapter 2 of this Statement;
• It wholly supports the approach of allocating Land to the West of St Athan as part of the Deposit RLDP whilst also providing detailed commentary on the specific wording of Policy HG1 KS5 (Land to the West of St Athan). This is covered in Chapter 3 of this Statement; and
• It provides commentary on a range of development management policies. This is covered in Chapters 4, 5, 6, and 7 of

this Statement.
1.8. As well as this Statement, Savills has provided commentary on these specific policies under the VoG's consultation website.

Policy SP1 (Sustainable Growth Strategy), Policy SP2 (Settlement Hierarchy), and Policy SP6 (Housing Requirement)
2.1. Together, these policies have the effect of:
• Setting the housing requirement to be delivered over the RLDP plan period of 7,890 homes with a flexibility allowance applied on top so that provision is made for a total of 8,660 homes. This is the same housing requirement to that included in the Preferred Strategy which was found by Welsh Government to be in conformity with Future Wales (Policies SP1 and SP6);
• Identifying the extent of the Strategic Growth Area as the primary focus of new housing growth. Concentrations of new housing are focussed in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity. St Athan is a specifically named settlement within the Strategic Growth Area (Policy SP1); and
• Identifying St Athan as a Primary Settlement in the third tier of the settlement hierarchy. This is the same tier of the settlement hierarchy as St Athan is in the adopted LDP (Policy SP2).
2.2. Hallam are generally supportive of the aims of these three policies.
2.3. They recognise that the housing requirement has been subject to extensive scrutiny and been found to be appropriate by Welsh Government in response to the Preferred Strategy. In that sense, there is nothing further for Hallam Land to comment upon here other than to note that it should reasonably be seen as the minimum number of homes that the RLDP should be aiming to deliver, particularly following the publication of the 2022-based household projections between Welsh Government's comments on the Preferred strategy and the publication of the Preferred Strategy.
2.4. The strategy – of focussing new housing in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity – is wholly supported. St Athan is clearly already a sustainable location for growth and its sustainability and connectivity have clear potential to enhance alongside further development. The delivery of growth in St Athan is therefore considered to firmly align with the RLDP's strategy.
2.5. The continued positioning of St Athan as a Primary Settlement in the third tier of the settlement hierarchy is considered appropriate though clearly the delivery of two Key Sites within St Athan as part of the RLDP has the potential to further elevate its position in the future. This is reflected in Table 10 of Background Paper 5 Settlement Appraisal Review where St Athan is given one of the higher scores of the Primary settlements.

Policy HG1 KS5 (Land to the West of St Athan)
3.1. Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.
3.2. There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.
3.3. The relevant policy for Land to the West of St Athan is Policy HG1 KS5.
3.4. As a starting point, Hallam wholeheartedly support the allocation of Land to the West of St Athan as a Key Site within the RLDP. Hallam made a comprehensive submission as part of the Call for Sites stage and since then have worked proactively with the VoG and other stakeholders to demonstrate that the site is suitable, deliverable, and viable. It's identification as a Key Site in the Deposit RLDP represents extensive and thorough assessment – its proposed allocated is therefore considered to be sound and firmly evidence based.
3.5. So that the policy functions as effectively as possible, Hallam has a small number of comments and included at Appendix A is a re-worded version of Policy HG1 KS5 which incorporates those changes with text suggested to be removed crossed through and text to be added shown underlined.
3.6. These proposed adjustments are considered in turn below and are structured around the sub-headings that are contained within the policy wording itself.
Site Capacity and Housing Trajectory
3.7. Extensive environmental and technical work has been undertaken by Hallam to support the promotion of the site and the development of a masterplan (and site capacity) that responds to the site's constraints and opportunities.
3.8. That said, Hallam is not a housebuilder and once an outline planning application has progressed, Hallam will identify a development partner (which could be a single or multiple housebuilders / housing associations). Clearly different housebuilders have different house types and differing approaches to density.
3.9. In addition, whilst a lot of technical and environmental work has been undertaken to date, clearly further technical work would be submitted at planning application stage which would further validate the site's capacity.
3.10. Legislative and guidance changes also have the potential to impact a site capacity. Whilst the masterplanning process has been prepared to be SAB compliant, the impact of the introduction of the requirement to secure SAB approval has had an impact on site capacity and it follows that a further, and as yet unknown, legislative or guidance change could have a similar impact.
3.11. This is not to suggest that there isn't a high degree of confidence that the site can deliver roughly 600 homes, rather that Hallam suggest that the word 'approximately' is added to the policy wording to reflect the potential for a

degree of deviation (which could be upwards or downwards).
3.12. Background Paper 9A Housing Land Supply and Housing Trajectory sets out the anticipated annual delivery rates for housing over the RLDP. With regards to the ability of the site to deliver the number of homes it is allocated for in the RLDP plan period, the housing trajectory for the site reflects that the first completion date was pushed back from 2027/2028 to 2028/2029 since the consultation on the Preferred Strategy. This means that the whole site continues to be shown as being delivered within the RLDP plan period.
3.13. Hallam support and agree with the approach set out in the Draft Housing Trajectory and see it to be realistic and achievable based on their experience and subject to usual caveats around the condition of the market, RLDP progression, and swift determination of a planning application.
Affordable Housing
3.14. At present, Policy HG1 KS5 (like all of the standalone policies for the other four Key Sites), states that the site should provide a minimum of 210 affordable housing units. This figure is derived from 35% of the number of homes that the site is allocated for (600 homes).
3.15. Worded at present, a strict interpretation of this policy could be that 210 affordable units must be provided onsite regardless of the total number of homes that are proposed. For example, it could be interpreted as requiring a fixed number of affordable homes of 210 homes, even if the total number of homes that are proposed on the site is fewer than the 600 homes that the site is allocated for or, conversely, that only 210 homes should be delivered as affordable if more than 600 homes were to be delivered and the RLDP allocation exceeded.
3.16. Hallam recognise that this is not what the policy wording is seeking to achieve (and their viability work for the site is based on the site delivering 600 homes of which 35% are affordable) but suggest that its wording could be clarified by removing reference to a specific number of affordable homes for the site to deliver in favour of just the affordable housing percentage being noted in the policy.
3.17. Hallam also suggest that the requirement for affordable housing units to not be in clusters of more than 10 homes is removed and that the approach is for this to be considered on a site by site and case by case basis and with recognition that Policy HG5 (Affordable Housing Exception Sites) which can provide a framework for 100% affordable sites of more than 10 homes to be delivered. As an example, and in the case of Land to the West of St Athan, the “Land South of the B4265, St Athan” (Site ID 457) portion of the site is likely better suited to a mixed-use development alongside the future St Athan Railway Sation. This portion of the site is probably better suited to a flatted form of development (either above non-residential uses or as a block) which tend to be delivered as 100% affordable housing developments rather than comprising a mix of private and affordable housing.
Sustainable Transport and Highways
3.18. This part of the policy sets out expectations relating to sustainable transport and highways and there are a number of matters which Hallam wish to comment on.
3.19. As a starting point, Hallam support the delivery of St Athan Railway Station and therefore commits to its safeguarding. Likewise, Hallam recognise the potential suitability for the “Land Between the Railway Line and B4265, St Athan” (Site ID 458) site to accommodate a Welsh-Medium Secondary School and can also therefore commit to safeguarding land for the delivery of a pedestrian and cycle bridge over the railway line. Specific comments on Policy TR1 (Transport Proposals) and Policy CI3 (New Community Facilities) are made elsewhere in this Statement.
3.20. With regards to the Sustainable Transport and Highways section of Policy HG1 KS5, Hallam’s overall position is that a careful balance needs to be reached between the policy wording being explicit as to what highway works must be delivered and reserving consideration of this until planning application stage where the exact site capacity is better understood and a full Transport Assessment submitted.
3.21. At present, Hallam’s view is that the policy wording is overly explicit and suggest that it could be qualified through the addition of the following text before listing the offsite highways improvements:
‘Subject to the Strategic Transport Assessment and site-specific Transport Assessment submitted at planning application stage’.
3.22. Turning to the specific offsite highways measures that are listed within the policy wording, Hallam have four comments.
3.23. Firstly, it is suggested that the delivery of an active travel link along the B4265 between the site entrance and the Gileston Road junction should be secured via a financial contribution that is pooled with KS4 Church Farm. This reflects that the delivery of this link not only links Hallam’s site to other services in St Athan but also linking KS4 Church Farm to the services that are proposed and uses for which land is safeguarded within Hallam’s site. Clearly this is also to the benefit of existing residents of St Athan. This would reflect the approach that is proposed to be taking for the pooling of Section 106 monies for the delivery of an active travel route between St Athan and Llantwit Major.
3.24. Secondly, Hallam flag the need for the RLDP to be sufficiently flexible with regards to the delivery of an active travel link between St Athan and Llantwit Major. Ultimately, the purpose of delivering this active travel route would be to provide a connection from St Athan to Llantwit Major Railway Station and the delivery of a Railway Station in St Athan would remove the necessity of delivering this active travel connection. Hallam’s suggested amendments to the policy wording seeks to reflect this.
3.25. Thirdly, Hallam have been consistent in highlighting that, whilst there is an aspiration to deliver an improved pedestrian link along Llantwit Road, a combination of the road width and the extent of third party ownerships make delivering a continuous link very challenging with a pragmatic approach instead needing to take place that recognises the ability to deliver betterments but acknowledges that delivering a continuous link is unlikely to be possible. Hallam has suggested additional wording to clarify this.
3.26. Fourthly, Hallam highlight that the designing of a loop road within the site to facilitate access by a bus may be superfluous and represent an over-engineered solution given the potential for the St Athan Transport Interchange that land is safeguarded for under Policy TR1 (Transport Proposals) is envisaged to accommodate infrastructure to accommodate a bus connection. On that basis, it is suggested that the following clause is added to the policy wording to

reflect that bus connectivity to the site may be delivered not via an internal bus loop:
'Subject to progress on the St Athan Transport Interchange as land is safeguarded for under Policy TR1 (Transport Proposals)'
Community Infrastructure
3.27. There are three points which Hallam wish to make in connection to this element of Policy HG1 KS5.
3.28. Firstly, Hallam suggest that the wording of the part of the policy relating to financial contributions to fund the delivery of additional school places needs to be adjusted. At present this part of the policy is worded as if there is an automatic requirement to provide Section 106 monies for school places where Circular 13/97 is clear that a contribution should only be sought where the schools do not have current projected capacity to accommodate the new children from the development. Hallam's proposed adjustments seek to ensure that this part of the policy reflects this though note that Background Paper 43 Education forecasts a need for a financial contribution to be made for additional school places at all English and Welsh primary and secondary schools that the site is within the catchment of.
3.29. Secondly, Hallam note that Table 10 of Background Paper 34 Community Facilities identifies an existing over-provision of community space within the St Athan Ward of 778sqm and a surplus of 531sqm of community floorspace at 2036 when the level of housing to be allocated in the Deposit RLDP is delivered. It is understood that this is on the basis of no community floorspace being delivered as part of Hallam's proposals or as part of the KS4 Church Farm site. Hallam suggest that the wording of this element of the policy needs to reflect that community floorspace should only be required to be provided in the case of a local shortage in provision. Aligned to this, Hallam also suggest that the reference to specifically providing a 'community building' is adjusted to instead make reference to 'community space'. This reflects that the community space element of scheme, if indeed it is actually required, could be a part of a larger mixed-use building (probably in the Mixed-Use / Community area) rather than as a standalone building.
3.30. Thirdly, Hallam note the error in the wording of the sixth bullet point under the 'Sustainable Transport and Highways' heading where reference is made to the safeguarding of land on the southern side of the railway line as being identified in Policy CI3(2) where-as it should be Policy CI3(6). This is a minor amendment that should be made to ensure consistency.
Green Infrastructure, Recreation Spaces, and Biodiversity
3.31. The masterplan prepared by PAD Design and submitted by Hallam shows the site delivering a mix of public open space and green infrastructure including the provision of allotments, a Neighbourhood Equipped Area of Play, a Local Equipped Area of Play, and a sports pitch. This is welcomed in Background Paper 32A Green Infrastructure Assessment of Key Sites which, at Paragraph 5.55 recognises that a 'ground up' approach has been taken in the masterplanning approach.
3.32. This is shown indicatively to illustrate the composition of public open space and green infrastructure that the site could provide alongside the other elements of built development that the site is allocated and the masterplan makes provision for.
3.33. Whilst, Hallam recognise the need to provide public open space, the starting point for this should be the Fields In Trust Standards and Hallam therefore suggest an approach where the policy wording is not specific about what forms this should take.

Policy TR1 (Transport Proposals)
4.1. This policy identifies three active travel routes and two public transport schemes that the Deposit RLDP safeguards land for, as well as three highway improvement schemes that are identified as being required to mitigate the impact of development. Two of these are in St Athan – one being the St Athan Transport Interchange for which land is safeguarded for and the second being the Gileston Road Junction which is identified as a required highway improvement. Both are considered in turn below.
St Athan Transport Interchange
4.2. Hallam support the safeguarding of land for the St Athan Transport Interchange and see that its delivery would be to the benefit of the Key Site itself but also more broadly to St Athan and western parts of the VoG.
4.3. It is clear from discussions with Transport for Wales that there is a strong business case for the delivery of a railway station and that the creation of "critical mass" through residential development around it has a key role in driving its delivery, as does the nationally significant economic role that the Bro Tathan Enterprise Zone has and the Aberthaw Green Energy Park will have. The proximity of St Athan to both of these hubs clearly contributes to its fundamental sustainability and suitability for growth whilst the further development of a critical mass of housing and employment generating uses will further support linkages between them and strengthen the business case for a new railway station at St Athan. This is reflected in TFW's 'Today, Tomorrow, Together: A Vision for Rail Across Wales and the Borders' which confirms that the delivery of St Athan Railway Station remains in TFW's pipeline which has been endorsed by the Westminster Government.
4.4. The location that is identified on the Proposals Map is Transport for Wales' preferred location within the site and has been incorporated into the masterplanning approach which seeks to create a node around it by incorporating a bus interchange and a mix of uses.
4.5. At present, the Proposals Map identifies the location of the Railway Station using a red star which is positioned on the railway line itself but without the required land take not spatially being defined.
4.6. Whilst Hallam recognise that the exact land take required will need to be refined further through discussion with TFW, it may be the case that the mixed-use element on this portion of the site comes forward before the Railway Station.
4.7. The early delivery of these elements should be welcomed as clearly the mixed-use element both enhances the range of services and facilities in St Athan but also would mean that the Railway Station is integrated upon delivery.
4.8. On that basis, it is imperative that the safeguarding of land for the Transport Interchange is limited only to that land required to deliver the Transport Interchange and is done in such a way such the safeguarding does not sterilise non-transport related development from this portion of the site until the Railway Station has been delivered.

Gileston Road Junction, St Athan
4.9. Paragraphs 6.199 and 6.200 relate to the expectation that vehicle trips as a result of RLDP allocations in St Athan are anticipated to trigger the need to upgrade the Gileston Road Junction to a signal-controlled arrangement. This is informed by the conclusions of Table 3 of the Strategic Transport Assessment which forecasts that the junction will be operating above capacity during both the weekday AM and PM peak by the RLDP's end point.
4.10. Hallam note that Technical Note 08 of the Strategic Transport Assessment identifies that the improvements to the Gileston Road Junction are to be delivered by VoG and funded through financial contributions from seven sites that the RLDP proposes to allocate.
4.11. Improvements to this junction are to be funded by a number of sites; however it is unclear whether (and if so, when) forward funding will be secured by the Council and clearly there cannot be a situation where none of the sites can deliver homes until strategic highways works are funded / completed. We therefore seek further clarification over the phasing of these works and note that early delivery of homes ahead of strategic highway improvements is likely to be important for deliverability of each strategic site.
4.12. To respond to Hallam's above comments, one approach could be for references to highway improvement works to be entirely removed from this policy or, if they are to remain, that qualifying text is added to note that the need for and format of any improvements will be subject to detailed consideration at planning application stage and that such contributions must be justified in planning terms, particularly where (in the case of Pen Y Turnpike Road and Waycock Cross for Land to the West of St Athan), the distance from a site and the junction to be improved is significant and therefore thee number of vehicle trips that would be generated modest.
4.13. This aligns with Hallam's suggested approach to the specific wording of Policy HG1 KS5.

Policy CI1 (Open Space Provision)
5.1. This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.
5.2. Hallam note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.
5.3. Hallam is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter.

Policy CI3 (New Community Facilities)
6.1. As well as allocating land for five new or improved education developments, this policy safeguards 'Land South of the Railway Line, St Athan' for the delivery of a Welsh-medium secondary school.
6.2. This policy is clearly of interest to Hallam because Paragraph 6.250 places a requirement for the safeguarding of land on the northern side of the railway line on their Land to the West of St Athan Key Site for a footbridge to land on.
6.3. With the policy wording being intentionally light-touch, Paragraph 6.250 of the Deposit RLDP provides greater detail about the safeguarding of this land (and other paragraphs in the Deposit RLDP relate to other community facilities that Policy CI3 covers). It effectively does two things.
6.4. Firstly, it notes that the delivery of this school will require active travel improvements including the safeguarding of land for a pedestrian and cyclist footbridge over the railway line.
6.5. Secondly, it is clear that the safeguarding of this land is in response to a forecast increase in demand for Welsh-medium secondary school places across the whole of the VoG as a result of expanded capacity at Welsh-medium primary schools across the VoG. On this basis, it follows that this location has been selected as a preferred location because of its ability to serve the wider sub-region.
6.6. Hallam recognise that this site could be a suitable location for a Welsh Medium Secondary School and, as a principle, is agreeable to the safeguarding of land for the footbridge landing on the northern side of the railway line.
6.7. Paragraph 6.250 of the Deposit RLDP is clear that the delivery of a Welsh-Medium secondary school is in response to a regional / sub-regional demand rather than a local need as a result generated either by the development of Land West of St Athan or other emerging allocations within St Athan and it cannot be the case that Hallam are expected to make disproportionate contributions to either the delivery of the school or required active travel improvements just because they have control of the site or that it is next to the Key Site.

Policy CC1 (Residential Operational Net Zero Carbon Development)
7.1. The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) before the policy wording sets out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.
7.2. As a starting point, Hallam share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) can present challenges. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this will result in an uneven framework for housebuilders, significantly adding cost and reducing certainty.
7.3. The justification for using planning policy to set requirements exceeding building regulations is set out in Section 7

of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.
7.4. There are two points to be made by Hallam here:
7.5. Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage that such an approach would not be sound. This Written Ministerial Statement was subject to an unsuccessful judicial review.
7.6. Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations. Where there are existing Local Plans in England that take this approach, they do not align with the Westminster Government's position and there will be no Local Plans emerging including such policies.
7.7. Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs (Bridgend and Merthyr Tydfil) do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound at Examination stage.
7.8. Secondly, Hallam have concerns with the approach that has been taken with regards to viability.
7.9. From Hallam's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.
7.10. As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated. This is important as it demonstrates that, whilst Hallam do not believe such a policy approach should be taken, the development of the site at the time of the completion of the Development Viability Model for the site is viable whilst meeting the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development).
7.11. Hallam's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. This concern is particularly exacerbated by the fact that, as recognised at Paragraph 6.47 of Background Paper 42 Viability Assessment, takes the lowest estimate for the works required to achieve these policy expectations, Savills' experience – both that of their development land team based in Wales and their environmental sustainability team based across England - is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.
7.12. Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy DNP3 (Glamorgan Heritage Coast)
8.1. This policy relates to the Glamorgan Heritage Coast, identifying a series of land uses that are permissible within the policy area before setting three tests that must be satisfied for development within the Glamorgan Heritage Coast to be permissible where there is an adverse environmental impact.
8.2. Hallam note that the 'Land South of the B4265, St Athan' portion of the land that they control is both proposed to be retained as part of the Glamorgan Heritage Coast (a continuation of the position taken in the adopted LDP) whilst also forming part of the Land to the West of St Athan Key Site where the masterplan at Figure 17 shows it as accommodating the potential new railway station and a mixed-use area (including car parking).
8.3. The relevant extract of the Proposals Map is replicated below:
8.4. The exact composition of the buildings proposed on this portion will require further refinement and will need to be driven by occupier requirements, but the masterplanning work undertaken by pad Design envisages that they could provide a mix of retail and food and drink uses most likely across some or all of the ground floor, alongside workshop, co-working or office incubator space at upper floor levels and perhaps at ground floor level. There could also be the potential for additional homes, likely in the form of apartments at upper floors, as part of a mix of uses. It is realistic therefore to anticipate that this portion of the site will accommodate buildings of up to three or four storeys with a high plot ratio to reflect the uses and supporting infrastructure that it is to accommodate.
8.5. Hallam's position is that the continued inclusion of this parcel of land as part of the wider Glamorgan Heritage Coast is inappropriate for two reasons.
8.6. Firstly, and its most basic level, the approach of allocating the site for development whilst retaining a designation that inherently seeks to restrict the type, form, and quantum of development, is wholly contradictory.
8.7. Designation of this portion of the site as part of the Glamorgan Heritage Coast will mean, given that the uses that Figure 17 envisages as being delivered on the site are not those that the first part of Policy DNP3 (Glamorgan Heritage Coast) allows for, any application for development will need to demonstrate that there is a compelling need for the development, that the benefits outweigh the harm, and that appropriate mitigation measures are in place. This the potential to prejudice its development or, at very least, greatly impact how it is developed whilst requiring.
8.8. Secondly, it is difficult to see how this land warrants ongoing inclusion within the designated Glamorgan Heritage Coast. This is something that is considered in more detail in the Review of Landscape Character and Visual Amenity (December 2022) prepared by FPCR and submitted as part of the Call for Sites (and also available as part of the consultation on the Deposit RLDP as a piece of Key Site Supporting Information). Paragraph 5.13 of the FPCR document

concludes on this piece of land that:
'Through the fieldwork it is considered that the Site does not display any "special environmental qualities" identified by the Policy and plays no intrinsic role in the Policy designation, as it is effectively forms a rather ordinary grazing field. It is influenced by the urbanising elements of the adjacent B4265, the Railway Line, the Tarmac Cement works, and to some degree the built edge of St Athan. Furthermore, it is bound and contained by trees and woodland beside the railway line, which prevents wider intervisibility with the coastline.'
8.9. Taking the above together, Hallam suggest that the preparation of the RLDP provides the opportunity to define the extent of the Glamorgan Heritage Coast to respond to both the landscape value of certain sites but also the wider aspirations of the RLDP. If it is not within the gift of VoG to redefine the boundaries of the Glamorgan Heritage Coast through the RLDP then Hallam suggest that an additional element could be added to this policy to confirm that it does not apply to land which is allocated for development.

Appendix A - rewording of Policy HG1 KS5

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3y3

6994 Comment

Document Element: Land at Clare Gardens,

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Dwr Cymru Welsh Water has made representations on planning application ref 2025/01008/RG3.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure

where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
Our representations on the site allocations are included in appendix 2.
We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the 'domestic' supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.
Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site
Our representations on site allocations are provided in the table below. The following caveats are applicable to all sites:
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion.
• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at

capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
The following provisions are applicable to all allocated employment sites:
• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
• Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcements.
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

6995 Comment

Document Element: St Athan Primary School, St

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Dwr Cymru Welsh Water has made representations on planning application ref 2025/00991/RG3.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.

Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
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Productive and enterprising places
SP14 - employment growth
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We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the ‘domestic’ supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the

potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
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• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
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See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

6996 Comment

Document Element: St Richard Gwyn Catholic

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Dwr Cymru Welsh Water has made representations on planning application ref 2023/00285/RG3.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
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Our representation on the above site is included in appendix 1.
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SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)

SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
Our representations on the site allocations are included in appendix 2.
We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the 'domestic' supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.
Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site
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• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify

the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
The following provisions are applicable to all allocated employment sites:
• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
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• Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcements.
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

6997 Comment

Document Element: Lower Cosmeston Farm,

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Dwr Cymru Welsh Water has made representations on planning application ref 2022/01113/RG3.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037

Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
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The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
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CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
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We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the 'domestic' supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge

consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
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• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
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See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

6998 Comment

Document Element: Upper Cosmeston Farm,

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Dwr Cymru Welsh Water has made representations on planning application ref 2020/01170/OUT.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision

Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
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Community facilities
CI3 – new community facilities
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CI5 - cemetery and crematorium provision
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See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

6999 Comment

Document Element: Land south of the railway,

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Water Supply - No watermains crossing the site.
Sewerage - No sewers crossing the site.
Wastewater Treatment Works (WwTW) - Welsh Water is delivering a scheme at West Aberthaw WwTW by 2030.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
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SP12 - retail floorspace provision
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Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places

SP14 - employment growth
Our representations on the site allocations are included in appendix 2.
We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the 'domestic' supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.
Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site
Our representations on site allocations are provided in the table below. The following caveats are applicable to all sites:
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion.
• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
The following provisions are applicable to all allocated employment sites:

• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
• Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcements.
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

7114 Comment

Document Element: St Athan Primary School, St
Respondent: Barratt Redrow Homes [2669]
Agent: Turley

Summary:

As worded, the Policy is not clear what land is allocated. Whilst the principle of transferring land for expansion of the school (as part of Church Farm phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

Full text:

Policy SP1 - Sustainable Growth Strategy
Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.
It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.
In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government

Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"
Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be concentrated is supported.

Policy SP2 - Settlement Hierarchy
The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable. As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Policy SP4 - Placemaking
We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.
The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses... ' or to be developed at 'high densities... and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.
Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Policy PGDl - Creating Well Designed and Inclusive Places
There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy CII - Open Space Provision
The wording of Policy CII, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the

Deposit Plan but Policy CII should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy CII requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7212 Comment

Document Element: St Athan Primary School, St

Respondent: Mrs Melissa Plimmer [3599]

Summary:

The proposed expansion of St Athan Primary School lacks a guaranteed timeline for when these facilities will be operational relative to house completions.

Full text:

Representation on the Vale of Glamorgan Deposit RLDP 2021–2036
Specific Policy/Site Objection:
• Policy SP4.4: Land at Church Farm, St Athan
• Policy SP4.5: Land to the West of St Athan
• Clive Road (Additional Allocation)
• Policy EMP2: MOD St Athan / Bro Tathan
Status: Unsound
1. Introduction
I wish to formally object to the allocation of the above sites and the broader designation of St Athan as a "Primary Settlement" for high-density growth within the Replacement Local Development Plan (RLDP). This allocation fails the Test of Soundness regarding Consistency (with national climate goals) and Effectiveness (deliverability of infrastructure).
2. Failure of Sustainable Transport (Policy SP7 & SP10)
The RLDP identifies St Athan as a "Strategic Hub," yet it remains the only primary settlement in the Vale of Glamorgan without a direct rail link. Relying on the "Active Travel" aspirations of Policy SP10 is unrealistic for a community where the majority of residents commute to Cardiff, Bridgend, or Barry.
The proposed density at the above sites will inevitably lead to an unsustainable increase in private car journeys on the B4265, specifically at the Gileston Road junction and Weycock Cross, which are already at or near capacity.
Concrete infrastructure is needed to be in place prior to any development of the land. Often intentions of infrastructure are not progressed. In addition where infrastructure is not in place prior to housing many commuters will become accustomed to travel by car and wont switch to public transport. It is difficult to see how developments work with Future Wales: The National Plan 2040
Active travel should look at linking key destinations and with the western vale being spread over longer distances more effort should be given to linking population centres with separated bicycle paths and wide accessible pavements. Shared bike / foot paths are inherently dangerous not allowing the safe use of wheelchairs and prams and sufficient use for children and dog walkers. Cycling should not have to stop at every intersection which creates visibility black spots by the way they turn away from traffic.
With current planned housing and that of additional housing in the LDP creating over 1,000 new homes and with each household having 1-2 cars per household this will add significant additional numbers of journeys on already poor road infrastructure. The vale lacks sufficient north / south routes pushing vehicles towards Weycock Cross in Barry which will have its own traffic issues or via Cowbridge with small country lanes. I personally worked in Cowbridge travelling from St Athan where buses would take over 1 hour 10 minutes and even then not arriving in time to start work. In contrast car travel would be 10 minutes or cycle would be 20 minutes but over dangerous roads.
Travel to Barry for meetings at peak times can take over 50 minutes from St Athan with significant delays leading to Weycock Cross and passed the secondary schools even before developments in the RLDP or existing planning. Public transport gets caught in the same traffic issues.
Access into St Athan is already dangerous from the war memorial with one near fatal accident already having taken place since the ‘improvements’ to the junction. Proposals for additional access from B4265 onto developed land would be on a hill with poor visibility and around a blind bend. Currently there is poor visibility leaving St Athan due to the side by side two car exit blocking views in both directions along with more visibility issues looking westward due to traffic furniture and signage.
While Bro Tathan (Policy EMP2) provides jobs, there is no guarantee that the people moving into local developments will work there. If they commute elsewhere, the RLDP fails its own climate goals (Policy SP1) by creating a "commuter colony" rather than a sustainable community.
Reference Policy CI3 (New Community Facilities). The proposed expansion of St Athan Primary School lacks a guaranteed timeline for when these facilities will be operational relative to house completions. New access to the school under existing planning is only ‘proposed’ and existing access to the school via Rock Road is a poorly surfaced and narrow one way road but is often ignored with traffic coming via Rectory Drive which has a ‘No entry except for access’ restriction but is not enforced causing large numbers of vehicles into residential areas not built

for this type of activity.
Speeding is already a great concern in the village with the current level of vehicle traffic with little compliance with the 20mph speed limit and no enforcement.
3. Coalescence and Loss of Settlement Identity (Policy SSC1)
The scale of development proposed for Church Farm, in conjunction with Policy SP4.5 (Land West of St Athan), threatens the distinct character of the village. The erosion of the "Strategic Gap" between St Athan and Eglwys Brewis violates the principles of Policy SSC1 (Settlement Boundaries). This "urban creep" creates a continuous sprawl that permanently destroys the rural setting of the historic Church Farm and the village's unique sense of place.
St Athan should no longer be thought of as a village but as a small town with infrastructure to meet the growing demands of the population and lacks facilities that are given to surrounding towns such as fire / ambulance and police stations.
If the jobs at the Enterprise Zone (Aston Martin, Bro Tathan) do not match the demographic of the new residents, St Athan simply becomes a "dormitory" village, increasing the carbon footprint as people drive to Cardiff or Bridgend for work. In addition people will travel to St Athan from other areas should they be employed at the new commercial sites.
4. Infrastructure Lag and Healthcare Capacity (Policy CI3)
Under Policy CI3, development should only proceed where adequate community facilities exist or can be provided. Current primary healthcare services in St Athan and nearby Llantwit Major are already oversubscribed. The RLDP provides no "Triggers for Delivery" to ensure that new medical and educational facilities will be operational prior to the occupation of the hundreds of homes planned for the Church Farm site. This creates a significant risk to the wellbeing of both new and existing residents. Access to both village GP services are on a part time basis. With new dentist rules in Wales, this will increase the need for further travel around the area to meet simple check ups. With no A&E facilities in the county St Athan often falls between Cardiff and Bridgend hospitals and continued poor roads together with additional traffic gives greater concern when emergencies happen.
5. Environmental and Biodiversity Impact (Policy SP5)
The Church Farm site consists of high-quality agricultural land and vital greenfield habitats. While Policy SP5 mandates a "Net Benefit for Biodiversity," the total loss of soil permeability and ancient hedgerow connectivity on a site of this scale cannot be mitigated by tokenistic landscaping. Once this valuable land is developed it is irretrievably lost for current and future generations. Currently there are red list species using the space like Yellowhammers and Skylarks. In addition there has been a collapse of invertebrate bio-mass over the last 40 years and personally seen since moving the area in 1980. Net Benefit for Biodiversity plans do not address any of these local and national concerns.
Land to the west of St Athan (SP4.5) This site consists of Grade 2 (Good) or 3a (Excellent) agricultural land. Under Planning Policy Wales (PPW) 12, such land should only be developed if there is an "overriding need" and no lower-grade land is available. The Vale of Glamorgan council has not sufficiently explored brownfield alternatives in the Barry Docks or the St Athan Enterprise Zone. The increased light pollution and "urban glow" will impact the rural character of the Western Vale.
The invertebrate charity Buglife shows that based on citizen science monitoring data, there has been a 75% to 79% decline in the abundance of flying insects in Wales between 2004 and 2023. Natural Resources Wales also reported
• 79% Decrease in Flying Insects (2004–2023): Data from the "Bugs Matter" survey, which counts insect "splats" on vehicle number plates, recorded this 79% reduction in Wales, with 2023 showing further declines from previous years.
• Specific Invertebrate Declines: Moths, which are key pollinators, have seen an average decline of 43% in abundance since 1970.
• Widespread Biodiversity Loss: Welsh wildlife has decreased on average by 20% since 1994, and 18% of species in Wales are at risk of extinction.
• Habitats in Peril: Over the past 50 years, many insects have suffered declines of 65% to 70% in certain areas, particularly moths, butterflies, ladybirds, and ground beetles.
• Impact on Food Chain: Invertebrates that provide food for farmland birds have seen declines of 50-80%.
The cumulative impact of hard-standing surfaces also raises serious concerns regarding surface water runoff into the River Thaw catchment area. Significant surface flooding already takes place across the western Vale spilling onto roads causing travel disruption.
An increase in hard surfaces also increases ambient temperatures compared to grassland, woodland and other green spaces necessitating increased power use for cooling and comfortable living temperatures. Building practices can help mitigate this but only where this is incorporated into sustainable building rules.
Replacing green fields (which act as a natural sponge) with hundreds of roofs and driveways at Church Farm (SP4.4) and Land West of St Athan (SP4.5) will create a "funnel effect."
Dwr Cymru Welsh Water has previously noted concerns regarding the St Athan Wastewater Treatment Works. Proof is required that the current system can handle the RLDP's projected
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low without increasing overflow events. Further development risks "Combined Sewer Overflows" (CSOs) into local watercourses, which contradicts the Council's Nature Emergency declaration.
The Vale of Glamorgan Council requires a Sustainable Drainage Systems (SuDS) Approval Body (SAB) review. Attenuation ponds are often poorly maintained and can fail during the "1-in 100-year" storm events which are becoming more frequent.
6. Conclusion
The allocation of the above site policies are unsound. It promotes car-dependent growth in a rural location without the necessary infrastructure "trigger points" to protect the local environment or the B4265 road network.
Proposed Remedy: Reduce the housing density at the above sites and re-classify St Athan as a "Minor Rural Settlement" until such time as a dedicated rail link, suitable active travel infrastructure or high-frequency public transport other than rail is fully funded and scheduled for delivery.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3yw

6680 Comment

Document Element: CI4 - PROTECTING AND ENHANCING EXISTING COMMUNITY FACILITIES

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the saftey of pupils. Achieving Secured By Design acrediation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.

South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.

We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.

We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.

The replacement development plan outlines its Vision and objectives of the RLDP as follows:

'By 2036':

The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.

Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.

The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.

Objectives:

1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment

Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:

Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.

Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.

Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.

TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.

TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'

Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.

Violence against women and Girls:

Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.

In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it

within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at: https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where "qualifying activities" take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states 'The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and

25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.'
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery. Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)
identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.

South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local

health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism

(protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver

especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of

new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

6730 Comment

Document Element: CI4 - PROTECTING AND ENHANCING EXISTING COMMUNITY FACILITIES

Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres.

There is no reference to the expectation that local communities are consulted in relation to the development of community facilities.

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning
guidance (SPG) proposed. We are keen to ensure that these SPG's are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are
involved in the development of some of these. The content and application of the SPG's will be fundamental to the effectiveness of several of the policies identified in the
deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community
amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient
communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: "The Local Development Plan will support resilient and sustainable
local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part
of sustainable growth."

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces

that produce food are missed, which could support local
diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

“Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other
opportunities for local food production as part of multifunctional green infrastructure.”

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their
proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative
impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

6.54 We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live
full, productive and prosperous lives.'

6.60 We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid
HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to
ensure Developers submit a quality HIA and implement the conclusions.

6.61 Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

6.62 Wales Health Impact Assessment Support Unit has recently released guidance on HIA - see https://phwwhocc.co.uk/whiasu/ for more information and toolkits to ensure most up to date is in use.

6.63 Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the community..'.

6.65 Suggestion to change wording from 'encouraged' to 'expected' for example:
Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement
for HIA will assist with this expectation.

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference “enhancements to leisure, sport and recreation spaces”. Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation. It is recommended that the Key Site schedules include minimum on-site provision standards and delivery
phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population
growth.

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail
centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer
supply chains. This limits opportunities for strengthening local food economies.
It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for ‘local affordable food’ outlined in SP5.

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach.”

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to
consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and
Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: “Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food
infrastructure within walking distance of new residential areas.” This addresses diet related health inequalities, encourages healthier communities and aligns with HIA
guidance.

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply
chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable
agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models.

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses - to include the following wording: “Rural diversification proposals that support agro-ecological farming, sustainable local food production,
community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations.”

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel
Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022
01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing
flooding and making use more comfortable during hot weather (such as shading from trees). We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

SP13 Community infrastructure and planning obligations:

We want to take this opportunity to highlight the challenges that population growth places on healthcare
services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure. Please refer to the information provided as part of the background evidence paper titled 'BP37
Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within
existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new
developments to take forward its strategic objectives.

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space Assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres. Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.”
There is no reference to the expectation that local communities are consulted in relation to the development of community facilities. We would like to see a
requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and
challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities
that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales’ push for local supply resilience, this is a major opportunity gap. Consider including the following wording:

“Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains.” This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or
urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: “Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing.”

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food
production, short supply chains or sustainable farming practices.
Consider including the following wording: “Development proposals should encourage short supply chains, low-carbon farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives.”

Change suggested by respondent:

Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.”

We would like to see a requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

7000 Comment

Document Element: CI5 - CEMETERY AND CREMATORIUM PROVISION

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Water Supply - A 3" diameter watermain crosses the site.
Wastewater - There are no public sewers close to this site.
Wastewater Treatment Works (WwTW) - N/a

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.

Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
Our representations on the site allocations are included in appendix 2.
We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the 'domestic' supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.
Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site
Our representations on site allocations are provided in the table below. The following caveats are applicable to all sites:
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion.
• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
The following provisions are applicable to all allocated employment sites:
• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
• Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcements.
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

4500 Object

Document Element: Land south of Port Road
Respondent: Mr Simon Parker [2821]
Summary:
This is not needed.

Full text:
This is not needed.

Change suggested by respondent:
Leave the Model Farm alone

Sound: No
Attachments: None

4680 Object

Document Element: Land south of Port Road
Respondent: Mr Tim Griffiths [2578]
Summary:
yet again building an industrial park on farmland taking away produce producing land and adding to more traffic to an already congested A4226

Full text:
yet again building an industrial park on farmland taking away produce producing land and adding to more traffic to an already congested A4226

Change suggested by respondent:
Drop it from the plan

Sound: No
Attachments: None

4690 Support

Document Element: Land east of Cardiff
Respondent: Amstone Developments Limited [3758]
Agent: Tetra Tech Cardiff
Summary:
Amstone Developments Limited (ADL) support the draft RLDP allocation of the Site within the 'Major Employment Allocation – Land East of Cardiff Airport, Roose'

Full text:

These representations relate to 'Land at Tredogan Road, Rhoose, Barry' (the Site), owned by Amstone Developments Ltd (ADL).

Amstone Developments Limited (ADL) support the draft RLDP allocation of the Site within the 'Major Employment Allocation – Land East of Cardiff Airport, Roose'

Requested Modifications
Policy SP14
Amend Policy SP14 and its supporting text to confirm that the Major Employment Allocation at Land East of Cardiff Airport may accommodate a broad range of employment-generating uses, consistent with the definition of economic development in PPW and TAN 23, and not restricted solely to B1, B2 or B8 uses

Policy EMP4
Clarify the definition of "non-employment proposals" so that non-B1/B2/B8 uses capable of generating employment are properly treated as "employment uses". Remove -duplicated criteria already controlled via other policies

Modification- Supporting Text
Update the supporting text to acknowledge that employment allocations within the Enterprise Zone should support a flexible mix of economic uses reflecting the national policy position in PPW, TAN 23 and Future Wales

The evidence and policy context clearly support the continued allocation of the Site for employment, enterprise and commercial use. This is consistent with the Council's own SPG and emerging LDP policies which aim to de-risk the under-delivery of employment land and job creation and enhance the Site's potential to attract inward investment and high-value economic activity.

Amstone Developments Limited fully support that the RLDP allocates the Site for general employment use (B1, B2, and B8) with flexibility to accommodate complementary economic development, consistent with national guidance, the Use Classes Order (Wales), and market evidence

Change suggested by respondent:

No Change

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/swx

4691 Object

Document Element: Land east of Cardiff

Respondent: Amstone Developments Limited [3758]

Agent: Tetra Tech Cardiff

Summary:

Amend Policy SP14 and its supporting text to confirm that the Major Employment Allocation at Land East of Cardiff Airport may accommodate a broad range of employment-generating uses, consistent with the definition of economic development in PPW and TAN 23, and not restricted solely to B1, B2 or B8 uses

Full text:

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Amstone Developments Limited fully support that the RLDP allocates the Site for general employment use (B1, B2, and B8) with flexibility to accommodate complementary economic development, consistent with national guidance, the Use Classes Order (Wales), and market evidence

Change suggested by respondent:

Amend Policy SP14 and its supporting text to confirm that the Major Employment Allocation at Land East of Cardiff Airport may accommodate a broad range of employment-generating uses, consistent with the definition of economic development in PPW and TAN 23, and not restricted solely to B1, B2 or B8 uses

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/swx

5033 Object

Document Element: Land to the South of

Respondent: Hannah Elward [3090]

Summary:

Local infrastructure is already under considerable strain. Roads around the motorway junction experience congestion, particularly at peak times. Additional development would exacerbate traffic pressures, increase pollution, and heighten safety risks. There is no clear evidence that supporting infrastructure—roads, schools, healthcare, drainage, and utilities—can accommodate further demand without significant and disruptive upgrades.

Full text:

Local infrastructure is already under considerable strain. Roads around the motorway junction experience congestion, particularly at peak times. Additional development would exacerbate traffic pressures, increase pollution, and heighten safety risks. There is no clear evidence that supporting infrastructure—roads, schools, healthcare, drainage, and utilities—can accommodate further demand without significant and disruptive upgrades.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5104 Object

Document Element: Land south of Port Road

Respondent: Mrs Anne Sloman [668]

Summary:

Model Farm proposed development will change the landscape, destroy habitats, reduce biodiversity, add pressure to roads, cause flooding in Porthkrry Park

Full text:

This is an objection to further development in Rhoose on the following grounds:
● over development without improvement to infrastructure
● current roads unable to support additional traffic as a result of further development, roads in/out of Rhoose are already choked
● loss of green fields/arable land to building, solar panels, battery storage units
● Model Farm proposed development will change the landscape, destroy habitats, reduce biodiversity, add pressure to roads, cause flooding in Porthkrry Park
● additional pressure on already overloaded pumping stations/sewerage infrastructure
● adverse effect on current residents mental health due to over population of the village and loss of green areas
● increase in youth annoyance/antisocial behaviour

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/sz9

5121 Comment

Document Element: SP14 - EMPLOYMENT GROWTH

Respondent: Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]

Summary:

Jobs: The Council's 10-year dwelling-led growth option results in a requirement for 4,875 new jobs (325 p/a) over the plan period. This broadly aligns with the projected growth for 5,338 (355 p/a) new jobs in the Employment Land Review (BP12) and as set out in Policy SP14.

The level of employment growth proposed (5,338 jobs) over the plan period is below the target in the currently adopted plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.
Without prejudice to the Minster's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.
National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.
After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:
Annex 1 – General Conformity with Future Wales
• No significant concerns
Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)
• Spatial Strategy and Primary Settlements

• Housing and Economic Growth Levels – Regional Collaboration
• Maximising Affordable Housing Provision
• Delivery & Implementation – General
• Gypsy and Travellers
• Renewable Energy
• Minerals
• Best and Most Versatile Agricultural Land (BMV)
• Welsh Language

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.
My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.
Yours sincerely,
Neil Hemington
Chief Planner Welsh Government

Annex 1 - Statement of General Conformity
The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).
There is a joint position statement on the relationship between Bridgend, Cardiff and the Vale of Glamorgan (BP20A), which considers population growth, migration patterns, housing completions, employment characteristics, demographics, commuting and transport links between the three adjoining authorities. The Welsh Government supports the principle of this work which demonstrates how change in the Vale of Glamorgan relates and complements growth in adjoining local authorities. This approach illustrates a good mechanism for other local authorities to follow.
Reasons
Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the climate change and biodiversity emergencies, making the best use of resources.
Policy 1 and Policy 33 of Future Wales states that Cardiff, Newport, and the Valleys will be the main focus for growth and investment in the region. The strategic diagram (p163) also identifies the Vale of Glamorgan within the National Growth Area. The Vale of Glamorgan RLDP, specifically BP20A, provides robust evidence on the interrelationship and key issues with adjoining authorities, including their interaction and how they have shaped and influenced the scale/location of growth in the RLDP. This is set out in the three Joint Position Statements (JPSs).
BP45 'Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR), May 2024, provides further evidence on how the scale of growth indicated for the region has shaped the scale of future economic growth within the Vale of Glamorgan. This results in a higher level of employment growth in the Vale of Glamorgan primarily to increase self-containment and reduce out-flows to adjoining urban areas. Two key areas for future economic growth are identified at Cardiff Airport/Bro Tathan Enterprise Zone and Aberthaw Power Station.
The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.
On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):
Policy 1: Where will Wales grow
Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 6: Town Centre First
Policy 10: International Connectivity – Cardiff Airport
Policy 12 Regional Connectivity
Policy 33: National Growth Area – Cardiff, Newport and the Valleys
Policy 36: South-East Metro
Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to

locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.
With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.
The Level of Growth - Homes and Jobs
The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).
Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.
BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.
Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.
The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level of growth proposed in the plan.
We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.

The Welsh Government notes that BP0A identifies small and large windfalls, based on historic trends of 53/yr and 80/yr respectively. Also, the large windfalls are not included in the first two years of the trajectory, as per the DPM. A non-delivery allowance of 5% is identified, which reflects local characteristics in the Vale of Glamorgan. A flexibility allowance of 9.8% has been factored into the provision. The Welsh Government supports this approach, although whilst Appendix 1 contains a housing trajectory, there is no table to mirror that of Table 21, DPM. This should be included in Appendix 1. 6

Jobs: The Council's 10-year dwelling-led growth option results in a requirement for 4,875 new jobs (325 p/a) over the plan period. This broadly aligns with the projected growth for 5,338 (355 p/a) new jobs in the Employment Land Review (BP12) and as set out in Policy SP14.
The level of employment growth proposed (5,338 jobs) over the plan period is below the target in the currently adopted plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.
In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of homes and jobs proposed in the plan, which is in general conformity with Future Wales.
Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.
The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.
Paragraph 6.137 of the plan states:
"Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary."
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?
Affordable Housing Exceptions Sites
Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.
Employment Land
The Council's Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).
Delivery and Implementation
PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.
The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth

required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.
The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have 'rolled over' from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.
The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters.
It will be for the Council to justify deliverability supported by robust financial viability.
Gypsy and Travellers
The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are 'immediate' by 2026. WG note that 4 pitches have since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

Policy SP9 identifies a site at Llangan (0.76Ha) to accommodate the 7 pitches needed. It will be for the Council to demonstrate the appropriate site selection assessment process has been followed and that the site complies with requirements in PPW (4.2.35), Circular 005/2018 (paragraph 35) any relevant guidance and the DPM (5.80-5.85) to allocate a deliverable site in the plan period. The views of the relevant statutory bodies must also be agreed with no outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.
Renewable Energy
Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Could the Council provide an update on alternative options for a DHN in Barry?
It is welcome that the Renewable Energy Assessment (REA) has considered BMV policy, specifically for solar PV, and use of the Predictive ALC Map. The assessment has only considered non-BMV land (Subgrade 3b, Grade 4 and 5). The assessment would benefit from referencing the clarification provided in the DCPO letter of 1st March 2022 in respect of solar PV and BMV agricultural land for completeness.
The study identifies that in the Vale of Glamorgan solar development is more suitable than wind energy because of the flight path of aircraft in the south of the County Borough. However, there are some opportunities for wind sites, but these are likely to be small (<10MW) where aviation risks are lower and there is some grid access. Conversely, there are large expanses of land suitable for solar areas (>10MW) to the West of the County Borough, where there is little existing development. The study identifies 20 large-scale solar areas but recognises that grid constraints may impact the ability of sites to come forward.
Solar and wind search areas (where appropriate) below the 10MW Developments of National Significance (DNS) have been identified (Policy CC3). The plan also includes a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW (Policy CC4). Policy CC3 makes reference to adhering to the criteria in Policy CC4. However, would it not be the case that if search areas have been identified in Policy CC3 have they not already met the criteria? If they would not, should they be identified in the first place? Clarity would be beneficial. The Welsh Government supports the approach but seeks clarity on the point raised.
The Welsh Government notes the proposed search areas for wind energy near Morfa Ystrad Owen/Nant Rhydhalog, according to the Peatlands of Wales Evidence Score Map, the search area includes areas of peatland (Evidence Score 4). The site is also a SINC. This raises concerns as to how the inclusion of this search areas meets the policy test in PPW 6.4.15, 1a and 1b (Stepwise) regarding avoidance of irreplaceable peatland habitats and PPW 6.4.34.
Policy CC4 refers to Developments of National Significance (DNS) in 6.344 and 6.346. This should now refer to Strategic Infrastructure Projects (SIP) which replaced DNS.
Minerals
The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in the Vale of Glamorgan. The Welsh Government policy clarification letter (dated 11 November 2021) identifies a surplus of 1.68mt of crushed rock. As there is a surplus of crushed rock reserves and a lack of sand and gravel production in the Vale, no specific allocations are required in the replacement plan. It is unclear whether a Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region been agreed, or does the latest Position Statement (July 2022) explain how any shortfall will be met across 9

the region, particularly for crushed rock, of which the Vale has a surplus? Clarification would be beneficial.
BMV Agricultural Land
The Welsh Government has engaged with the Council for land quality advice, survey advice and ALC survey validation for candidate sites. The LPA has produced a specific topic paper on BMV policy application. BP23A. The Deposit RLDP allocates 188 hectares of housing land, 5.62 ha is identified as BMV land (under 3% of total housing allocations). The RLDP:
• Has sought to avoid BMV land wherever possible;
• Uses the Predictive ALC Map as a core evidence layer to inform: The spatial strategy;
• Settlement hierarchy decisions; and

• Candidate site assessments.
•
• Directs strategic growth to areas with least BMV land
• Removes or avoids allocations where BMV impacts were significant or unjustified.
• Quantifies total BMV loss and demonstrates it is minimal (5.62ha) and proportionate at plan level.
• Applies a sequential approach through: Preference for brownfield and non-BMV sites;
• Replacement of higher-BMV sites with lower-grade alternatives where possible.
•
• Requires site-specific ALC surveys to verify actual land quality before allocation.
• Demonstrates that allocated BMV land is: Often small, fragmented, or constrained;
• Sometimes previously disturbed or incapable of being farmed differently from surrounding lower-grade land; and
• Necessary to deliver the Plan's housing strategy where reasonable alternatives are unavailable.
•

In conclusion, the Welsh Government consider the Authority has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy, and on that basis no objection is offered.
Green Infrastructure
Policy SP19 should explicitly reference the need for development to be accompanied by a Green Infrastructure Statement.
PPW12 requires decision makers to apply the step wise approach to GI, with enhancement secured at every stage where possible, there is no distinction made between the quality of the GI assets – the qualification in the policy statement that states proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure should be redrafted to remove the quality reference. The need to avoid an impact in the first instance should also be explicitly incorporated into the policy.
Criterion 1 (Policy SP20) should be redrafted – the stepwise approach in PPW 12 6.4.15 1a - does not distinguish between relative ecological value – the avoidance step applies to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.
Welsh Language
There is limited reference to the Welsh language in the plan, either potential adverse impacts arising through development, or mechanisms via a policy framework to support and grow the use of the language. There are references to a number of Welsh-medium schools (3.26) and the increase in the number of people able to speak Welsh according to the 2011 census (3.52) but there is no mention of the authority's Welsh Language Strategy or promoting or cross-referencing to the aims of 10

Cymraeg 2050: A million Welsh-speakers. Paragraph 6.81 of the plan refers to development north west of Barry:
"Land at North West Barry is allocated for a residential development of up to 376 dwellings and public open space. The site is in a sustainable location on the edge of the Barry, a key settlement, in a location that is well served by services and facilities, including a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium and Church in Wales) and two high schools (English and Welsh Medium) all located in reasonable walking distance. There is an active travel route along Port Road West, bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry. Barry station is 1.3 miles from the site entrance."
There is no mention that the Council want to undertake a Welsh Language Impact Assessment (WLIA) so there appears no attempt to measure the impact on the Welsh schools resulting from housing development? Could the Council clarify if such implications have already been covered in the WLIA for the plan, ISA, or are any specific policies necessary?

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/syf

5127 Comment

Document Element: SP14 - EMPLOYMENT GROWTH

Respondent: Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]

Summary:

Employment Land
The Council's Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.
Without prejudice to the Minster's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.
National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.
After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:
Annex 1 – General Conformity with Future Wales
• No significant concerns
Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)
• Spatial Strategy and Primary Settlements
• Housing and Economic Growth Levels – Regional Collaboration
• Maximising Affordable Housing Provision
• Delivery & Implementation – General
• Gypsy and Travellers
• Renewable Energy
• Minerals
• Best and Most Versatile Agricultural Land (BMV)
• Welsh Language

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.
My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.
Yours sincerely,
Neil Hemington
Chief Planner Welsh Government

Annex 1 - Statement of General Conformity
The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).
There is a joint position statement on the relationship between Bridgend, Cardiff and the Vale of Glamorgan (BP20A), which considers population growth, migration patterns, housing completions, employment characteristics, demographics, commuting and transport links between the three adjoining authorities. The Welsh Government supports the principle of this work which demonstrates how change in the Vale of Glamorgan relates and complements growth in adjoining local authorities. This approach illustrates a good mechanism for other local authorities to follow.
Reasons
Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the climate change and biodiversity emergencies, making the best use of resources.
Policy 1 and Policy 33 of Future Wales states that Cardiff, Newport, and the Valleys will be the main focus for growth and investment in the region. The strategic diagram (p163) also identifies the Vale of Glamorgan within the National Growth Area. The Vale of Glamorgan RLDP, specifically BP20A, provides robust evidence on the interrelationship and key issues with adjoining authorities, including their interaction and how they have shaped and influenced the scale/location of growth in the RLDP. This is set out in the three Joint Position Statements (JPSs).
BP45 'Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR), May 2024, provides further evidence on how the scale of growth indicated for the region has shaped the scale of future economic growth within the Vale of Glamorgan. This results in a higher level of employment growth in the Vale of Glamorgan primarily to

increase self-containment and reduce out-flows to adjoining urban areas. Two key areas for future economic growth are identified at Cardiff Airport/Bro Tathan Enterprise Zone and Aberthaw Power Station.
The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.
On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):
Policy 1: Where will Wales grow
Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 6: Town Centre First
Policy 10: International Connectivity – Cardiff Airport
Policy 12 Regional Connectivity
Policy 33: National Growth Area – Cardiff, Newport and the Valleys
Policy 36: South-East Metro
Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.
With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.
The Level of Growth - Homes and Jobs
The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).
Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.
BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.
Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council

considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.
The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level of growth proposed in the plan.
We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.
The Welsh Government notes that BP0A identifies small and large windfalls, based on historic trends of 53/yr and 80/yr respectively. Also, the large windfalls are not included in the first two years of the trajectory, as per the DPM. A non-delivery allowance of 5% is identified, which reflects local characteristics in the Vale of Glamorgan. A flexibility allowance of 9.8% has been factored into the provision. The Welsh Government supports this approach, although whilst Appendix 1 contains a housing trajectory, there is no table to mirror that of Table 21, DPM. This should be included in Appendix 1. 6

Jobs: The Council's 10-year dwelling-led growth option results in a requirement for 4,875 new jobs (325 p/a) over the plan period. This broadly aligns with the projected growth for 5,338 (355 p/a) new jobs in the Employment Land Review (BP12) and as set out in Policy SP14.
The level of employment growth proposed (5,338 jobs) over the plan period is below the target in the currently adopted plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.
In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of homes and jobs proposed in the plan, which is in general conformity with Future Wales.
Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.
The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.
Paragraph 6.137 of the plan states:
"Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary."
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional

control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?
Affordable Housing Exceptions Sites
Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.
Employment Land
The Council's Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).
Delivery and Implementation
PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.
The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.
The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have 'rolled over' from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.
The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters.
It will be for the Council to justify deliverability supported by robust financial viability.
Gypsy and Travellers
The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are 'immediate' by 2026. WG note that 4 pitches have since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

Policy SP9 identifies a site at Llangan (0.76Ha) to accommodate the 7 pitches needed. It will be for the Council to demonstrate the appropriate site selection assessment process has been followed and that the site complies with requirements in PPW (4.2.35), Circular 005/2018 (paragraph 35) any relevant guidance and the DPM (5.80-5.85) to allocate a deliverable site in the plan period. The views of the relevant statutory bodies must also be agreed with no outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.
Renewable Energy
Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Could the Council provide an update on alternative options for a DHN in Barry?
It is welcome that the Renewable Energy Assessment (REA) has considered BMV policy, specifically for solar PV, and use of the Predictive ALC Map. The assessment has only considered non-BMV land (Subgrade 3b, Grade 4 and 5). The assessment would benefit from referencing the clarification provided in the DCPO letter of 1st March 2022 in respect of solar PV and BMV agricultural land for completeness.
The study identifies that in the Vale of Glamorgan solar development is more suitable than wind energy because of the flight path of aircraft in the south of the County Borough. However, there are some opportunities for wind sites, but these are likely to be small (<10MW) where aviation risks are lower and there is some grid access. Conversely, there are large expanses of land suitable for solar areas (>10MW) to the West of the County Borough, where there is little existing development. The study identifies 20 large-scale solar areas but recognises that grid constraints may impact the ability of sites to come forward.
Solar and wind search areas (where appropriate) below the 10MW Developments of National Significance (DNS) have been identified (Policy CC3). The plan also includes a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW (Policy CC4). Policy CC3 makes reference to adhering to the criteria in Policy CC4. However, would it not be the case that if search areas have been identified in Policy CC3 have they not

already met the criteria? If they would not, should they be identified in the first place? Clarity would be beneficial. The Welsh Government supports the approach but seeks clarity on the point raised.
The Welsh Government notes the proposed search areas for wind energy near Morfa Ystrad Owen/Nant Rhydhalog, according to the Peatlands of Wales Evidence Score Map, the search area includes areas of peatland (Evidence Score 4). The site is also a SINC. This raises concerns as to how the inclusion of this search areas meets the policy test in PPW 6.4.15, 1a and 1b (Stepwise) regarding avoidance of irreplaceable peatland habitats and PPW 6.4.34.
Policy CC4 refers to Developments of National Significance (DNS) in 6.344 and 6.346. This should now refer to Strategic Infrastructure Projects (SIP) which replaced DNS.
Minerals
The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in the Vale of Glamorgan. The Welsh Government policy clarification letter (dated 11 November 2021) identifies a surplus of 1.68mt of crushed rock. As there is a surplus of crushed rock reserves and a lack of sand and gravel production in the Vale, no specific allocations are required in the replacement plan. It is unclear whether a Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region been agreed, or does the latest Position Statement (July 2022) explain how any shortfall will be met across 9

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Cymraeg 2050: A million Welsh-speakers. Paragraph 6.81 of the plan refers to development north west of Barry: "Land at North West Barry is allocated for a residential development of up to 376 dwellings and public open space. The site is in a sustainable location on the edge of the Barry, a key settlement, in a location that is well served by services and facilities, including a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium and Church in Wales) and two high schools (English and Welsh Medium) all located in reasonable walking distance. There is an active travel route along Port Road West, bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry. Barry station is 1.3 miles from the site entrance."
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Change suggested by respondent:

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Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/syf

5186 Support

Document Element: Bro Tathan Aerospace and

Respondent: Welsh Government (Economy, Treasury and Constitution Group - Property Infrastructure) [1213]

Agent: CarneySweeney

Summary:

We write to support Policy SP14 'EMPLOYMENT GROWTH' and in particular to the Policy's allocation of Bro Tathan Business Park.

We note and welcome that the policy allocates additional land at the Business Park compared to the Preferred Strategy consultation document. The Bro Tathan Business Park has the ability to cater for general employment demands, but also has very significant potential to cater for highly specialised/niche employers which require air-side facilities and/or very large single site opportunities.

We note that the Employment Land Study identifies 66.7 hectares of net developable land at Bro Tathan, which we understand reflects areas with planning permission and an application currently pending determination at the eastern zone. While we believe that, depending on tenant/developer demand, Bro Tathan Business Park could accommodate additional development in the Plan period, we note that the whole site is protected as an existing employment site under Policy EMP3 (4). As such, any further development would be able to be determined on its merits and considered to be in accordance with the Development Plan in principle. We consider, therefore, that the Plan accommodates sufficient flexibility to meet changing requirements which could potentially exceed 66.7 hectares at Bro Tathan Business Park.

Full text:

We write to support Policy SP14 'EMPLOYMENT GROWTH' and in particular to the Policy's allocation of of Bro Tathan Business Park.

We note and welcome that the policy allocates additional land at the Business Park compared to the Preferred Strategy consultation document. The Bro Tathan Business Park has the ability to cater for general employment demands, but also has very significant potential to cater for highly specialised/niche employers which require air-side facilities and/or very large single site opportunities.

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Finally, given the Welsh Government's objectives for the site to cater for general employment demands (including specialised/niche employers, operators requiring air-side facilities and inward investors seeking a very large single site opportunity), we consider the policy should refer to “Bro Tathan Business Park” rather than “Bro Tathan Aerospace and Business Park

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form Redacted - https://valeofglamorgan.oc2.uk/a/syy

5187 Comment

Document Element: Bro Tathan Aerospace and

Respondent: Welsh Government (Economy, Treasury and Constitution Group - Property Infrastructure) [1213]

Agent: CarneySweeney

Summary:

Given the Welsh Government's objectives for the site to cater for general employment demands (including specialised/niche employers, operators requiring air-side facilities and inward investors seeking a very large single site opportunity), we consider the policy should refer to “Bro Tathan Business Park” rather than “Bro Tathan Aerospace and Business Park

Full text:

We write to support Policy SP14 'EMPLOYMENT GROWTH' and in particular to the Policy's allocation of of Bro Tathan Business Park.

We note and welcome that the policy allocates additional land at the Business Park compared to the Preferred Strategy consultation document. The Bro Tathan Business Park has the ability to cater for general employment demands, but also has very significant potential to cater for highly specialised/niche employers which require air-side facilities and/or very large single site opportunities.

We note that the Employment Land Study identifies 66.7 hectares of net developable land at Bro Tathan, which we understand reflects areas with planning permission and an application currently pending determination at the eastern zone. While we believe that, depending on tenant/developer demand, Bro Tathan Business Park could accommodate additional development in the Plan period, we note that the whole site is protected as an existing employment site under Policy EMP3 (4). As such, any further development would be able to be determined on its merits and considered to be in accordance with the Development Plan in principle. We consider, therefore, that the Plan accommodates sufficient flexibility to meet changing requirements which could potentially exceed 66.7 hectares at Bro Tathan Business Park.

Finally, given the Welsh Government's objectives for the site to cater for general employment demands (including specialised/niche employers, operators requiring air-side facilities and inward investors seeking a very large single site opportunity), we consider the policy should refer to “Bro Tathan Business Park” rather than “Bro Tathan Aerospace and Business Park

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form Redacted - https://valeofglamorgan.oc2.uk/a/syy

5387 Object

Document Element: Land south of Port Road

Respondent: Emma Reed [2653]

Summary:

As this is an allocation the likely traffic generated by it must be included within the calculations for additional housing at Weycock Cross and all sites in Rhoose. The responses to the earlier consultation suggest this is not being done.

Full text:

AS this is am allocation the likely traffic generated by it must be included within the calculations for additional housing at Weycock Cross and all sites in Rhoose. The responses to the earlier consultation suggest this is not being done.

Change suggested by respondent:

All RDLP allocations and commitments for development must form part of any transport infrastructure statement to ensure the transport infrastructure plan is sound.

Sound: No

Attachments: None

5389 Object

Document Element: Land east of Cardiff

Respondent: Emma Reed [2653]

Summary:

Developments at the airport will yet cause more traffic congestion via Weycock Cross. The Airport has poor public transport infrastructure and lots of parking thereby encouraging more car travel.

Full text:

Developments at the airport will yet cause more traffic congestion via Weycock Cross. The Airport has poor public transport infrastructure and lots of parking thereby encouraging more car travel.

Change suggested by respondent:

Delete this site until improved road surface and public transport infrastructure is made available.

Sound: No

Attachments: None

5411 Object

Document Element: Land south of Port Road

Respondent: Emma Reed [2653]

Summary:

Object to the Model farm development. Some 6000 traffic movements a day! combined with weycock cross readers way other employment land at airport plus a 2000 pupil college. A comprehensive up to date transport assessment is needed to ensure the plan is sound.

Full text:

Object to the Model farm development. Some 6000 traffic movements a day! combined with weycock cross readers way other employment land at airport plus a 2000 pupil college. A comprehensive up to date transport assessment is needed to ensure the plan is sound.

Change suggested by respondent:

A transport impact assessment / model is needed for the whole plan and not on a piecemeal basis

Sound: No

Attachments: None

5434 Object

Document Element: Land south of Port Road

Respondent: Mrs Susan Evans [712]

Summary:

This would take farm land that is currently actively farmed. This should not be permitted.
This would also add to the already overburdened traffic on Port Road towards and at Weycock cross.

Full text:

This would take farm land that is currently actively farmed. This should not be permitted.
This would also add to the already overburdened traffic on Port Road towards and at Weycock cross.

Change suggested by respondent:

Removal of this proposal.

Sound: No

Attachments: None

5436 Object

Document Element: Land east of Cardiff

Respondent: Mrs Susan Evans [712]

Summary:

There is already an industrial area at St Athan which in not used, had a car factory which then closed in a short period, so this is unnecessary development.

Full text:

There is already an industrial area at St Athan which in not used, had a car factory which then closed in a short period, so this is unnecessary development.

Change suggested by respondent:

Removal of this proposal

Sound: No

Attachments: None

5470 Comment

Document Element: SP14 - EMPLOYMENT GROWTH

Respondent: Mr David Entwistle [3264]

Summary:

The strategic transport routes showing access between enterprise zones and culver house cross/M4 are currently inadequate to cope with increased HGV and business vehicle movements. Improvements on the 5 mile lane are a good start but similar work needs to be carried out on other routes. In order to attract high quality business to the area new roading needs to be built allowing high speed access to the M4. HGV's driving along narrow rural 30/40/50mph roads is not acceptable where the Vale is competing against enterprise zones in the other areas of the country with better roading.

Full text:

The strategic transport routes showing access between enterprise zones and culver house cross/M4 are currently inadequate to cope with increased HGV and business vehicle movements. Improvements on the 5 mile lane are a good start but similar work needs to be carried out on other routes. In order to attract high quality business to the area new roading needs to be built allowing high speed access to the M4. HGV's driving along narrow rural 30/40/50mph roads is not acceptable where the Vale is competing against enterprise zones in the other areas of the country with better roading.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5667 Object

Document Element: Land south of Port Road

Respondent: Councillor Samantha Campbell [1002]

Summary:

Cardiff Airport Enterprise Zone, primarily the development at Model Farm, is an unsustainable development and does not work in conjunction with the Wellbeing of Future Generations Act. We must preserving green spaces, especially those in which product crops for food or resale, in order to sustain our local circular economy not create a white elephant industry development.

Full text:

Cardiff Airport Enterprise Zone, primarily the development at Model Farm, is an unsustainable development and does not work in conjunction with the Wellbeing of Future Generations Act. We must preserving green spaces, especially those in which product crops for food or resale, in order to sustain our local circular economy not create a white elephant industry development.

Change suggested by respondent:

Remove Model Farm from the RLDP.

Sound: No

Attachments: None

5703 Comment

Document Element: Land east of Cardiff

Respondent: Mr David Entwistle [3264]

Summary:

I support these business developments in principle but fear that they will come before existing road and transport infrastructure is upgraded to cope. There needs to be substantial improvements to transport infrastructure before these sorts of developments are considered. By developing the business zones first the council also risks only attracting low quality businesses to the area as the higher quality businesses will be put off by poor infrastructure and transport links.

Full text:

I support these business developments in principle but fear that they will come before existing road and transport infrastructure is upgraded to cope. There needs to be substantial improvements to transport infrastructure before these sorts of developments are considered. By developing the business zones first the council also risks only attracting low quality businesses to the area as the higher quality businesses will be put off by poor infrastructure and transport links.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5704 Comment

Document Element: Land south of Port Road

Respondent: Mr David Entwistle [3264]

Summary:

I support these business developments in principle but fear that they will come before existing road and transport infrastructure is upgraded to cope. There needs to be substantial improvements to transport infrastructure before these sorts of developments are considered. By developing the business zones first the council also risks only attracting low quality businesses to the area as the higher quality businesses will be put off by poor infrastructure and transport links.

Full text:

I support these business developments in principle but fear that they will come before existing road and transport infrastructure is upgraded to cope. There needs to be substantial improvements to transport infrastructure before these sorts of developments are considered. By developing the business zones first the council also risks only attracting low quality businesses to the area as the higher quality businesses will be put off by poor infrastructure and transport links.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5705 Support

Document Element: Bro Tathan Aerospace and

Respondent: Mr David Entwistle [3264]

Summary:

I support these business developments in principle but fear that they will come before existing road and transport infrastructure is upgraded to cope. There needs to be substantial improvements to transport infrastructure before these sorts of developments are considered. By developing the business zones first the council also risks only attracting low quality businesses to the area as the higher quality businesses will be put off by poor infrastructure and transport links.

Full text:

I support these business developments in principle but fear that they will come before existing road and transport infrastructure is upgraded to cope. There needs to be substantial improvements to transport infrastructure before these sorts of developments are considered. By developing the business zones first the council also risks only attracting low quality businesses to the area as the higher quality businesses will be put off by poor infrastructure and transport links.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5706 Support

Document Element: Land to the South of

Respondent: Mr David Entwistle [3264]

Summary:

I support these business developments in principle but fear that they will come before existing road and transport infrastructure is upgraded to cope. There needs to be substantial improvements to transport infrastructure before these sorts of developments are considered. By developing the business zones first the council also risks only attracting low quality businesses to the area as the higher quality businesses will be put off by poor infrastructure and transport links.

Full text:

I support these business developments in principle but fear that they will come before existing road and transport infrastructure is upgraded to cope. There needs to be substantial improvements to transport infrastructure before these sorts of developments are considered. By developing the business zones first the council also risks only attracting low quality businesses to the area as the higher quality businesses will be put off by poor infrastructure and transport links.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5844 Object

Document Element: Land south of Port Road

Respondent: Barry & Vale Friends of the Earth [708]

Agent: Barry & Vale Friends of the Earth

Summary:

Object to the rolling forward of Model Farm development with no viability assessment as you requires in order that "the RLDP can satisfy new policy requirements and remain viable and deliverable" (refs. DMM+PPW)
The High Court blocked the first officer-recommended approval, because the non-viability had been concealed; this was one reason for Committee rejection in March'23. To now exempt it from viability assessment deviously ignores the your prescription for rolling forward, which the RLDP team has been unable to justify.
The site had no sustainability/viability assessment for the 2015 LDP, pretending siting in the Enterprise Zone covered it.

Full text:

Object to the rolling forward of Model Farm development with no viability assessment as you requires in order that "the RLDP can satisfy new policy requirements and remain viable and deliverable" (refs. DMM+PPW)
The High Court blocked the first officer-recommended approval, because the non-viability had been concealed; this was one reason for Committee rejection in March'23. To now exempt it from viability assessment deviously ignores the your prescription for rolling forward, which the RLDP team has been unable to justify.
The site had no sustainability/viability assessment for the 2015 LDP, pretending siting in the Enterprise Zone covered it.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

ModelFarm-NoRollIntoRLDP FoE 10Mar'26.doc - https://valeofglamorgan.oc2.uk/a/t76

5854 Object

Document Element: Land south of Port Road

Respondent: Barry & Vale Friends of the Earth [708]

Agent: Barry & Vale Friends of the Earth

Summary:

We submitted a "comment" but need to ensure it's taken as an objection to rolling forward this development into the RLDP. Exempting it from Site Specific Viability Assessment shows unacceptable bias - evidence shows it's unviable.
Its siting in CA&StAthan EnterpriseZone does not exempt it from sustainable development and viability requirements.
'FutureWales' recognised the EZ as a strategic economic location that complements (but does not replace) the National Growth Area structure. The EZ is not a Growth Area itself, but it supports the NGA's economic role.
The attached document ModelFarm-failsDMMcriteria FoE09Mar'26 gives supporting evidence from DMM and FutureWales.

Full text:

We submitted a "comment" but need to ensure it's taken as an objection to rolling forward this development into the RLDP. Exempting it from Site Specific Viability Assessment shows unacceptable bias - evidence shows it's unviable.
Its siting in CA&StAthan EnterpriseZone does not exempt it from sustainable development and viability requirements.
'FutureWales' recognised the EZ as a strategic economic location that complements (but does not replace) the National Growth Area structure. The EZ is not a Growth Area itself, but it supports the NGA's economic role.
The attached document ModelFarm-failsDMMcriteria FoE09Mar'26 gives supporting evidence from DMM and FutureWales.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation - https://valeofglamorgan.oc2.uk/a/t77

5863 Object

Document Element: Land south of Port Road

Respondent: Mr Jeff Smith [3399]

Summary:

Modal farm is prime active farmland this should be maintained to ensure local food production

Full text:

Modal farm is prime active farmland this should be maintained to ensure local food production

Change suggested by respondent:

Modal farm is prime active farmland this should be maintained to ensure local food production

Sound: No

Attachments: None

6003 Object

Document Element: Land south of Port Road

Respondent: Councillor Samantha Campbell [1002]

Summary:

Model Farm should not be on this plan. It's an area of significant importance for the local community, wildlife, and the economy as it currently stands. Taking that away for a white elephant of an industrial part would be seriously detrimental to the Vale as a whole, now and for future generations. It would be bring no growth to the area, only extra traffic, pollution, and disruption.

Full text:

Model Farm should not be on this plan. It's an area of significant importance for the local community, wildlife, and the economy as it currently stands. Taking that away for a white elephant of an industrial part would be seriously detrimental to the Vale as a whole, now and for future generations. It would be bring no growth to the area, only extra traffic, pollution, and disruption.

Change suggested by respondent:

Removal from the plans.

Sound: No

Attachments: None

6145 Object

Document Element: Land east of Cardiff

Respondent: Mrs Jacky Williams [3343]

Summary:

The current construction of the Vale College Campus will bring much additional traffic flow and delays on an already busy route that experiences significant delays at numerous times during the day. The situation will be exacerbated with the additional provision of industrial units on this site, the potential development at Model Farm and proposed housing developments in Rhoose.
Noting that Cardiff Airport is considered important as an international gateway and essential to Wales' economy, the access route (already not ideal) will be severely compromised and could further jeopardise the airport's future.

Full text:

The current construction of the Vale College Campus will bring much additional traffic flow and delays on an already busy route that experiences significant delays at numerous times during the day. The situation will be exacerbated with the additional provision of industrial units on this site, the potential development at Model Farm and proposed housing developments in Rhoose.
Noting that Cardiff Airport is considered important as an international gateway and essential to Wales' economy, the access route (already not ideal) will be severely compromised and could further jeopardise the airport's future.

Change suggested by respondent:

Improved road links and a greater incorporation of the airport rail link running into the various areas of the village will give people the option to make increased use of public transport and thus help with the traffic volume and flow.

Sound: No

Attachments: None

6147 Object

Document Element: Land south of Port Road

Respondent: Mrs Jacky Williams [3343]

Summary:

The potential development at Model Farm will remove a significant amount of green space and bring much additional traffic flow and delays on an already busy route that experiences significant delays at numerous times during the day. The situation will be exacerbated with the current construction of the Vale College Campus, with industrial units on the site, and proposed housing developments in Rhoose.
Noting that Cardiff Airport is considered important as an international gateway and essential to Wales' economy, the access route (already not ideal) will be severely compromised and could further jeopardise the airport's future.

Full text:

The potential development at Model Farm will remove a significant amount of green space and bring much additional traffic flow and delays on an already busy route that experiences significant delays at numerous times during the day. The situation will be exacerbated with the current construction of the Vale College Campus, with industrial units on the site, and proposed housing developments in Rhoose.
Noting that Cardiff Airport is considered important as an international gateway and essential to Wales' economy, the access route (already not ideal) will be severely compromised and could further jeopardise the airport's future.

Change suggested by respondent:

Improved road links and a greater incorporation of the airport rail link running into the various areas of the village will give people the option to make increased use of public transport and thus help with the traffic volume and flow.
The 'green wedge' must be preserved.

Sound: No

Attachments: None

6353 Object

Document Element: Bro Tathan Aerospace and
Respondent: Mr Reinie Adamson [3553]

Summary:

Proposed 1400 homes East Camp St Athan air base - site now VOG owned. Object strongly as many locals do demolition of 1) First Class condition - 400 seats purpose built cinema 2) 400 seat purpose built purpose built cinema Olympic size X standard pool 3) 2 sports hall X track of Olympic standard first class order. 4) 2 medical centre purpose built first condition.

Full text:

Proposed 1400 homes East Camp St Athan air base - site now VOG owned. Object strongly as many locals do demolition of 1) First Class condition - 400 seats purpose built cinema 2) 400 seat purpose built purpose built cinema Olympic size X standard pool 3) 2 sports hall X track of Olympic standard first class order. 4) 2 medical centre purpose built first condition.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

3553 Adamson Bro Tathan (6353)_Redacted.pdf - https://valeofglamorgan.oc2.uk/a/txk

6564 Support

Document Element: Land to the South of
Respondent: Renishaw Plc [1277]
Agent: Turley

Summary:

Renishaw Plc supports the retention of the Junction 34 (Hensol) allocation under Policy SP14.4, noting the rarity of well-connected, high-quality industrial sites. Phase 1 of the site has outline planning permission for up to 151,060.99 sqm of industrial space, a hotel/residential training centre, ancillary uses, and extensive infrastructure, with the first phase completed providing 400,000 sqft of space occupied by Renishaw. The site remains deliverable.

Future phases (Areas B, C, and D) are expected to provide over 1,000,000 sq ft of employment space, potentially creating 2,000 operational and 1,000 construction jobs, contributing significantly to regional sustainable growth.

Full text:

We write on behalf of our client, Renishaw Plc, in response to the current consultation on the Vale of Glamorgan Replacement Local Development Plan (RLDP). We write to provide our comments in relation to the Vale of Glamorgan Deposit RLDP.

This letter is accompanied by the following:
• Completed Public Consultation Representation Form.

Renishaw's comments on the Deposit RLDP policies and allocations are outlined below.

BACKGROUND

Established in 1973, Renishaw is a global leader in measurement, motion control, spectroscopy, and precision machining. The company is renowned for pioneering innovative solutions designed to enhance operational performance – optimising manufacturing efficiencies, improving product quality, advancing research capabilities, and increasing the effectiveness of medical procedures.

As part of a major redevelopment of its Miskin site in South Wales, Renishaw is investing over £50 million to expand its manufacturing capacity and reinforce its commitment to achieving net zero carbon emissions. This investment includes the construction of two new low-carbon production halls, which are designed to meet the growing domestic and international demand for its products, while also supporting research and development initiatives.

Policy SP14 – Employment Growth

Renishaw Plc supports the retention of Land to the South of Junction 34 of the M4, Hensol (36.23ha net) as a Major Employment Allocation under Policy SP14.4. The allocation of the site is crucial to ensure that the Council can meet its projected employment land needs and deliver the anticipated level of sustainable employment growth over the Plan period.

The site's continued allocation as a major employment site reflects it's importance as a key opportunity for investment and employment opportunities within the Vale of Glamorgan. The site is of strategic and regional importance as an

employment site in a market where high quality, well connected industrial sites are rare.

Outline planning permission was originally granted for the proposed site (Ref no. 2014/00228/EAO) on 22 June 2016.

This permission has subsequently been renewed via a S73 application (ref: 2021/00899/EAO) which extends the period of time for the submission of reserved matters for a further 5 years from the date of the new permission (to 22 December 2030). The permission provides for the following development:

"Outline planning permission with all matters reserved except for access, for development comprising class B1, B2 and B8 uses; a hotel/residential training centre (class C1/C2); and ancillary uses within class A1, A2, A3; associated engineering and ground modelling works and infrastructure, car parking, drainage and access for all uses; provision of infrastructure (including energy centre(s)); landscaping and all ancillary enabling works) at Renishaw Plc, Miskin Business Park, Miskin."

A summary of the key elements of the outline permission are:
• Up to 151,060.99sqm of industrial floor space comprising Class B1, B2, B8 uses;
• Up to 9,290.30sqm of Hotel/Residential Training Centre (Class C1/C2);
• Up to 1,300sqm of ancillary Class A1, A2 and A3 uses;
• Up to 3,200 car parking spaces;
• 30.51ha of Green Infrastructure, comprising landscaping, water balancing areas;
• Access and servicing arrangements; and,
• Ancillary services, including power/utilities (with potential to incorporate energy centre (s)).

Reserved matters permission (reference number: 2019/01421/RES) was approved on 20 May 2021 to bring forward the first phase of the development. This phase of the development is now complete and provides 400,000 sqft of floorspace which is occupied by Renishaw as an extension to its existing operations at Miskin. In addition to employment opportunities created over the construction period, the development has created additional operational jobs for Renishaw. Significantly, many of these jobs provide high quality employment opportunities in the skilled and specialist sector, helping to create skills and provide local employment opportunities.

Renishaw will shortly bring its wider land holdings to the market with the intention of attracting major employment generating uses - further enhancing the economy of the region. The remaining phases of the site (Areas B, C and D) provide further opportunity for inward investment over the Plan period and the creation of over 1,000,000 square feet of employment space.

It is anticipated that Areas B, C and D could have the potential to create over 2,000 operational jobs. During the construction phase, the development also has the potential to create over 1,000 jobs further adding to the employment opportunities created through the development.

The recent renewal of the outline planning permission ensures that the development of the site remains deliverable over the Plan period.

EMP3 - Protection of Existing Employment Sites and Premises

Renishaw Plc support the continued allocation of the current Renishaw premises as an existing Major Employment Site under Polic EMP3.6 – Renishaw, Junction 34, M4.

The allocation of the Renishaw site recognises the importance of the established employment site for the local economy. Renishaw continue to represent an important local employer, who provide high quality, skilled and specialist employment opportunities for the local population.

The continued safeguarding of the site for B1, B2 and B8 uses is therefore supported.

EMP4 – Non-Employment Proposals on Existing Employment Areas and Premises

General support is given to Policy EMP4 which seeks to restrict the development of non-B1, B2 and B8 uses to ancillary services and facilities associated with an existing or proposed employment use.

However, the Policy should provide greater flexibility to allow for appropriate employment generating proposals which complement the existing uses and which may not clearly fall within the B1, B2 and B8 use class. This flexibility is essential in order to allow the sites to respond to changing market demand and emerging markets.

Summary

We trust that the above representations assist and are taken into account as the preparation of the Plan progresses.

We would be grateful if we could be kept informed of future stages of the emerging RLDP.

If you require any further information, please do not hesitate to contact me.

Yours sincerely

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - https://valeofglamorgan.oc2.uk/a/3sh
Supporting Evidence - https://valeofglamorgan.oc2.uk/a/3td

6666 Comment

Document Element: Land east of Cardiff

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

SP14 (1) Land east of Cardiff Airport, Rhoose Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites

within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of “areas of high ecological value” will also go some way towards resolving the points we raise.
Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.
Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.
This will ensure that development in the area:
• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of ‘High Ecological Value’ (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger “policy hook” within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
“the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale.”
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
“Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value”.
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall

seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered. We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure
Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological
connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites

We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to ‘6 broad habitat types’ including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to ‘6 broad ecosystems’ to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP’s Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to

ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of

no adverse effect was reached. The justification for this is that it "is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary".
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW's Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational
Pressure' within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs
clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

6667 Comment

Document Element: Land south of Port Road

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of "areas of high ecological value" will also go some way towards resolving the points we raise.
Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this

within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.
Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.
This will ensure that development in the area:
• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of 'High Ecological Value' (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20

itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of
nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure
Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological
connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
"There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value".

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as 'search areas'). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely

that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to '6 broad habitat types' including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to '6 broad ecosystems' to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP's Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way

Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it “is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary”.
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW’s Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to

medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational
Pressure' within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs
clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

6668 Comment

Document Element: Bro Tathan Aerospace and

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

Strategic Opportunity at Bro Tathan

In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS. This will ensure that development in the area:
• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size. Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.

Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of "areas of high ecological value" will also go some way towards resolving the points we raise.

Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.
Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.
This will ensure that development in the area:
• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of 'High Ecological Value' (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
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(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
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Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure
Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological
connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
"There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value".

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be

supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as 'search areas'). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to '6 broad habitat types' including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to '6 broad ecosystems' to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP's Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it “is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary”.
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW’s Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat

As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational
Pressure' within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs
clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

6669 Comment

Document Element: Land to the South of

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of "areas of high ecological value" will also go some way towards resolving the points we raise.
Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.

Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.
This will ensure that development in the area:
• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of 'High Ecological Value' (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to

section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
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for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
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the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of
nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure
Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological
connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time.

Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to '6 broad habitat types' including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to '6 broad ecosystems' to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP's Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which

supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it “is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary”.
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW’s Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached.

The justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

6671 Comment

Document Element: Windmill Park, Hayes Road,

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to

coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of "areas of high ecological value" will also go some way towards resolving the points we raise.
Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.
Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.
This will ensure that development in the area:

• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of 'High Ecological Value' (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in

order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
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As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
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Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

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We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to ‘6 broad habitat types’ including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to ‘6 broad ecosystems’ to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP’s Strategic Sites, as set out in our response ref: CAS-234819-

C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan

Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it “is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary”.
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW’s Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of ‘Policy DNP8 – Severn Estuary Recreational
Pressure’ within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate

Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

6672 Comment

Document Element: Vale Business Park, Llandow

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites

In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of “areas of high ecological value” will also go some way towards resolving the points we raise.
Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.
Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.
This will ensure that development in the area:
• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of ‘High Ecological Value’ (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in

order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered. We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as

mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure
Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological
connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to ‘6 broad habitat types’ including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to ‘6 broad ecosystems’ to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP’s Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;

We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it “is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary”.
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW’s Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of ‘Policy DNP8 – Severn Estuary Recreational
Pressure’ within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of ‘Policy DNP8 – Severn Estuary Recreational Pressure’ within the deposit plan, which as above, we advise needs
clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that “three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar”. However, we also note that Table 6 in the HRA only

includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

6673 Comment

Document Element: Land at Llandow Trading

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site

Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of “areas of high ecological value” will also go some way towards resolving the points we raise.
Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.
Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.
This will ensure that development in the area:
• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of ‘High Ecological Value’ (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger “policy hook” within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
“the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green

Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure
Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological

connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to ‘6 broad habitat types’ including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to ‘6 broad ecosystems’ to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP’s Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and

KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

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Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

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Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
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Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

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Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development

in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning

application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it "is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary".
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW's Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational
Pressure' within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs
clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

6731 Comment

Document Element: SP14 - EMPLOYMENT GROWTH

Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities
that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales' push for local supply resilience, this is a major opportunity gap.

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning
guidance (SPG) proposed. We are keen to ensure that these SPG's are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are
involved in the development of some of these. The content and application of the SPG's will be fundamental to the effectiveness of several of the policies identified in the
deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community
amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: "The Local Development Plan will support resilient and sustainable
local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part
of sustainable growth."

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local
diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

"Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other
opportunities for local food production as part of multifunctional green infrastructure."

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their

proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

6.54 We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live full, productive and prosperous lives.'

6.60 We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to ensure Developers submit a quality HIA and implement the conclusions.

6.61 Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

6.62 Wales Health Impact Assessment Support Unit has recently released guidance on HIA - see https://phwwhocc.co.uk/whiasu/ for more information and toolkits to ensure most up to date is in use.

6.63 Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the community..'.

6.65 Suggestion to change wording from 'encouraged' to 'expected' for example: Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement for HIA will assist with this expectation.

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference “enhancements to leisure, sport and recreation spaces”. Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation. It is recommended that the Key Site schedules include minimum on-site provision standards and delivery phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population growth.

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer supply chains. This limits opportunities for strengthening local food economies.
It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for ‘local affordable food’ outlined in SP5.

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach.”

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: “Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food infrastructure within walking distance of new residential areas.” This addresses diet related health inequalities, encourages healthier communities and aligns with HIA guidance.

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as

the Vale. Policy supports general rural business diversification but does not explicitly enable agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models.

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses - to include the following wording: “Rural diversification proposals that support agro-ecological farming, sustainable local food production, community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations.”

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022 01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing flooding and making use more comfortable during hot weather (such as shading from trees). We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

SP13 Community infrastructure and planning obligations:

We want to take this opportunity to highlight the challenges that population growth places on healthcare services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure. Please refer to the information provided as part of the background evidence paper titled 'BP37 Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new developments to take forward its strategic objectives.

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present there does not appear to be a full Open Space Assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres. Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.” There is no reference to the expectation that local communities are consulted in relation to the development of community facilities. We would like to see a requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales’ push for local supply resilience, this is a major opportunity gap. Consider including the following wording:

“Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains.” This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: “Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing.”

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food

production, short supply chains or sustainable farming practices.
Consider including the following wording: “Development proposals should encourage short supply chains, low-carbon farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives.”

Change suggested by respondent:

Consider including the following wording: “Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains.” This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

6759 Support

Document Element: Land south of Port Road
Respondent: Legal and General [1270]
Agent: RPS

Summary:

Our client, Legal and General, fully support the proposed allocation within the Deposit Plan which is to contribute 25% of the RLDP allocated employment land provision.

The 44.75 ha business park is a key component of the St. Athan – Cardiff Airport Enterprise Zone. It aligns perfectly with Planning Policy Wales and Future Wales: The National Plan 2040, which identify this area as a nationally significant economic cluster. The site is already allocated in the current LDP and is proposed as a major employment allocation in the Replacement LDP (RLDP) through 2036.

The project will provide approximately 1.7 million sq. ft of high-quality office, industrial, and warehousing space. This will attract inward investment from knowledge-based and high-tech sectors, creating skilled jobs and training opportunities within the Cardiff Capital Region. As the landowner, Legal and General remains fully committed to delivering this site despite the ongoing appeal process.

The site is a "flagship" location, with strategic connectivity to Cardiff Airport and the Bro Tathan Enterprise Zone, intended to stimulate economic resilience. By collaborating with other users in the Enterprise Zone, this development will consolidate the Vale of Glamorgan’s role as a primary driver of growth in South East Wales.

Full text:

Introduction
The following representation is made in support of the employment allocation of Land south of Port Road (Model Farm), Rhoose (44.75 ha net) within the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan.
Policy SP14: Employment Growth of the Deposit Plan identifies the site as a strategic employment allocation to support job growth and economic prosperity across the Vale of Glamorgan over the plan period and to meet the projected employment land needs of 67.8 hectares of employment land, as well as the delivery of up to 5,338 jobs and provision of 182 net hectares of employment land for B1 (Office and Light Industry), B2 (General Industries) and B8 (Distribution and Storage).
Our client, Legal and General, fully support the proposed allocation within the Deposit Plan which is to contribute 25% of the RLDP allocated employment land provision.

Site Context
The site proposes a 44.75 ha business park on land at Port Road, Rhoose, adjacent to Cardiff Airport. The site will provide approximately 1.7 million sq. ft Class B1, B2 and B8 floorspace, car parking, landscaping, drainage infrastructure and biodiversity enhancement. It will provide high quality offices, light industrial and warehousing and distribution units in a unique setting. It will also deliver an extension to the existing Porthkerry Country Park.
The site is allocated in the adopted Local Development Plan (LDP) 2011 – 2026 under Policy SP2: Strategic Sites for employment uses at land adjacent to the airport and Port Road, Rhoose, as part of the St. Athan – Cardiff Airport Enterprise Zone. Additionally, the site is one of the 11 sites allocated for future employment development under Policy MG9.
The Cardiff Airport and Gateway Development Zone 2011-2026 Supplementary Planning Guidance (SPG) emphasises the strategic significance of the site, highlighting its potential to deliver regionally important economic growth across a range of employment sectors.
An outline planning application was submitted on the allocated site in 2019 for demolition of existing buildings and erection of 44.79ha Class B1/B2/B8 Business Park, car parking, landscaping, drainage infrastructure, biodiversity provision and ancillary works. The application was amended in 2021 to a hybrid planning application ref: 2019/00871/OUT comprising an outline application for the demolition of existing buildings and erection of 44.75ha Class B1/B2/B8 Business Park, car parking, landscaping, drainage infrastructure, ecological mitigation and ancillary

works (all matters reserved aside from access) within Area A and a full application for change of use from agricultural land to country park (Use Class D2) within Area B. The application was recommended for approval at Committee. Notwithstanding the positive recommendation, the site is currently subject to an appeal for non-determination of 2019/00871/OUT. The inquiry was adjourned in March 2025 due to procedural matters and is scheduled to recommence in March 2026. Legal and General remains committed to the delivery of the site through its participation in the appeal process.

Cardiff Airport and St Athan Enterprise Zone
Planning Policy Wales
Planning Policy Wales (PPW) forms the national policy for Wales, outlining guidance for making planning decisions. PPW advises that the planning system plays a central role in supporting economic growth by ensuring that a sufficient supply of appropriately located employment land is identified and protected through development plans.
Employment land should be aligned with the principles of sustainable development, the well-being goals, and national decarbonisation objectives. Planning authorities are required to:
• Plan proactively for a mix of employment opportunities;
• Allocate and protect land that meets the current and future needs of business and industry;
• Ensure that employment land is well-connected, particularly via public transport, road, and digital infrastructure.
Paragraph 5.4.17 recognises Enterprise Zones as an example of where co-ordinated action can take place to encourage investment in a particular sector in a particular place. It refers that planning authorities should seek to support the development of business networks and clusters particularly in relation to innovative and technology-based enterprise.

Future Wales: The National Plan 2040
Future Wales: The National Plan 2040 (Future Wales) forms the development plan for Wales. It influences all levels of the planning system in Wales and helps to shape Strategic and Local Development Plans prepared by councils.
Model Farm falls within the Gateway Development Zone of the St Athan – Cardiff Airport Enterprise Zone which has been designated by Welsh Government for aerospace and defence related investment. It is supported by Policy 10 of Future Wales which recognises:
'The Enterprise Zone offers a wide range of development sites and business accommodation, providing opportunities for the development of bespoke facilities or investment in existing accommodation'.
The strategic role of the Enterprise Zone is reinforced by several policies in Future Wales:
• Policy 1 (Where Wales Will Grow) – supports concentration of economic growth in the South East region, including Enterprise Zones.
• Policy 2 (Shaping Urban Growth and Regeneration) – requires that development at strategic gateways such as Cardiff Airport be maximised to support economic resilience.
• Policy 33 (National Growth Area – Cardiff, Newport and the Valleys) – identifies the Cardiff Airport & Bro Tathan Enterprise Zone as a nationally significant economic cluster.

Replacement Local Development Plan
The Deposit Plan sets out an overall strategy, allocating land for a range of and uses and setting out policies aimed at guiding development and framing development management decision making. The Deposit Plan Vision looks forward 15 years to 2036, where:
The Vale has a thriving local economy with a balanced, diversified business base. New employment growth at Bro Tathan and Cardiff Airport Enterprise Zones has attracted inward investment from knowledge-based and high-tech businesses, creating high quality employment and training.
Key strategic Objectives 9 Building a Prosperous and Green Economy – promotes the Cardiff Airport and St Athan Enterprise Zone as an important employment area, enabling delivery of high-quality and skilled jobs, training, and education opportunities. It promotes a range and choice of good quality employment land and supports infrastructure to enable local businesses to expand. The objective is to create opportunities for inward investment and enable the Vale of Glamorgan's economy to respond to future changes in work and employment patterns. Legal and General fully support the objective which aligns with Welsh Government aspirations for the Cardiff Airport and St Athan Enterprise Zone.

Employment Land Provision
The Council's adopted Economic Development, Employment Land and Premises SPG provides detailed guidance on how planning applications relating to employment land will be considered in support of the LDP strategy. The SPG reinforces the strong policy presumption in favour of retaining and delivering employment uses on allocated and existing employment sites, particularly those of regional economic importance such as land near Cardiff Airport and the Bro Tathan Enterprise Zone (i.e. Model Farm).
Model Farm's position within the Enterprise Zone, in proximity to Cardiff Airport, Bro Tathan Enterprise Zone and the Cardiff and Vale College development presents the opportunity to develop the area into a high-quality business cluster. These strategically located flagship sites are intended to stimulate inward investment and consolidate the role of the Vale of Glamorgan within the Cardiff Capital Region.
The Employment Land Study (March 2023) recognises the value of Model Farm in recommending its allocation in the RLDP. Accordingly, Policy SP14 – Employment Growth of the Deposit Plan consolidates this opportunity through allocating the Model Farm site as a major employment allocation. Legal and General agrees that the position of Model Farm as a major employment site within the employment hierarchy reflects its importance as a key area of investment and employment opportunity within the Vale of Glamorgan.

Delivery

The value that the Deposit Plan places on the development of Model Farm is wholly appropriate given its alignment with PPW, Future Wales and Welsh Government's reaffirmed commitment to delivering Enterprise Zones in Wales.
Legal and General remain committed to delivering the proposal at Model Farm. In doing so, Legal and General intend to collaborate with other users in the Enterprise Zone to realise its full potential in driving economic development of the wider Cardiff Capital Region.

Change suggested by respondent:

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Sound: Not specified

Attachments:

Supporting Evidence - https://valeofglamorgan.oc2.uk/a/37h

6802 Comment

Document Element: Land south of Port Road
Respondent: Barry & Vale Friends of the Earth [708]
Agent: Barry & Vale Friends of the Earth

Summary:

On Model Farm, WW said the developer would have to undertake a sewerage HMA which L&G have been unwilling to progress, doubtless because their Viability Assessment showed the development was uneconomic. Such an HMA may show the need for sewer links across unexplored land, possibly uncovering archaeological constraints, causing delays of several years.

It seems you have not followed Council's Methodology based on the Development Plans Manual to require this developer to reappraise existing LDP site allocations without extant planning permission through the candidate site assessment process.

I don't see that the Employment Land Study indicating (3.1) Model Farm to be a "realistic development proposal" over-rides the DPM guidance on examining viability constraints, so is this decision documented, please ?

Full text:

Thank you for signposting me to the Infrastructure Delivery document. I see this falls short of detailing the new sewerage infrastructure central to unlocking the development of allocated sites stated in para.i
Para. 3.104 mentions SuDS to prevent surface water entering the sewer system, but nothing on WW's strategic plan for local authority schemes to divert existing highway drainage into surface water out of their sewers.
Para.3.105 says the obvious that capacity may not exist within the existing sewerage network, but does not include sewage treatment capacity and does not specify where it's lacking. There's a comment for NW Barry that pumping capacity "may"not exist.
Para.3.108 says capacity constraints at treatment works and improvements as being in the current AMP or not, so why not be specific on the programme to 2030 ?
We see no mention of the Vale's Bathing beaches (several new ones) and policy to ensure sewage discharges do not undermine attaining Bathing Water standards; does this issue not belong in the RLDP, setting out divided responsibilities of VoG, NRW and DCWW (cf. Watchtower and Ogmore-by-Sea beaches closed 2024,5)?

On specifics, KS4 and KS5 say of capacity limits at West Aberthaw works that "DCWW has confirmed that upgrades are planned as part of the AMP8 programme 2025 and 2030". Can you provide documents on this?
WW said in 2015 they "planned" upgrades so questions are obvious - is the W.Aberthaw upgrade still not programmed and committed? Are the plans sufficient to take the much bigger numbers of homes now planned. Will land purchase and planning consent be needed? Will the developers proposing local sites have to pay via S.106?
On Model Farm, WW said the developer would have to undertake a sewerage HMA which L&G have been unwilling to progress, doubtless because their Viability Assessment showed the development was uneconomic. Such an HMA may show the need for sewer links across unexplored land, possibly uncovering archaeological constraints, causing delays of several years.
It seems you have not followed Council's Methodology based on the Development Plans Manual
to require this developer to reappraise existing LDP site allocations without extant planning permission through the candidate site assessment process.
I don't see that the Employment Land Study indicating (3.1) Model Farm to be a "realistic development proposal" over-rides the DPM guidance on examining viability constraints, so is this decision documented, please ?
In view of the response deadline, we look forward to a timely response. We'd ask that you consider the above omissions, deem that a firm Statement of Common Ground with DCWW similar to that of 2015 is required at this stage, and issue amendments to this draft RLDP to cover them.

Change suggested by respondent:

We'd ask that you consider the above omissions, deem that a firm Statement of Common Ground with DCWW similar to that of 2015 is required at this stage, and issue amendments to this draft RLDP to cover them.

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/38k

6870 Object

Document Element: Land south of Port Road
Respondent: The Stevens Family [2390]
Agent: Boyer Planning

Summary:

A summary of our main representations are as follows: - The Stevens Family question the need for Model Farm to be included in the provision for 182 net ha of employment land for the requirement of 67.8 ha under Policy SP14. If the rollover allocation at Model Farm (Policy SP14(2)) was removed, then the provision would still allow for nearly doubling the projected employment land needs.
- Significant concern is raised regarding the 'rollover' Land South of Port Road, Rhoose (Model Farm) Employment Allocation (as part of SP14: Employment Growth) as deliverability is not sufficiently demonstrated by the Council and Representors. Currently there is significant ambiguity regarding the actual delivery, contrary to the Welsh Government's Development Plans Manual (DPM) Edition 3 requirements.
- The proposed Model Farm allocation is currently subject to an Appeal, having had the previous planning applications quashed by the High Court.
- It is inappropriate to allocate an employment site which has been proven to be unviable through detailed independent assessment which predicted a loss of £10,405,000 before interest, or £34,508,455M if interest costs were payable at 5%.
- Supporting evidence confirms that whilst the Representors suggest they remain committed, there is a huge contradiction as they also suggest that they are taking a "long-term view" about when the scheme might come forward.
- Serious questions are raised in terms of the employment demand and delivery for a 161,834 sqm floorspace development considering the current available space, low uptake over the last decade and availability of more attractive and better connected alternatives.
- When assessed against the Tests of Soundness CE2 & CE3, Policy SP14(2) fails to adequately justify Model Farm's continued inclusion in the Deposit Plan.
- There are a number of technical constraints which have not been addressed sufficiently via the planning application process, and these simply cannot be left to roll forward to the Local Development Plan.

Full text:

Boyer have prepared and submitted the following representation on behalf of The Stevens Family in response to the current Vale of Glamorgan Replacement Local Development Plan (RLDP) 2021- 2036 Deposit Plan Consultation.

As you will be aware previous representations were submitted on behalf of The Stevens Family between 2019 and 2024 in response to the Quashed outline application submitted on behalf of Legal & General, and subsequent Appeal, in relation to the proposed Parc Busness Porth Cymru (PBPC) Business Park on land at Model Farm, Port Road, Rhoose (Ref: 2019/00871/OUT).

It is in this context upon which these representations, outlined below, are specifically made in relation to the Deposit Plan, and should also be read in conjunction with the previous 2024 Preferred Strategy representations relating to the proposed identification of the 44.75ha (net) Land South of Port Road, Rhoose (Model Farm) as a rollover Major Employment Allocation within Employment Growth Policy SP14(2).

As identified in previous correspondence, The Stevens Family does not object in principle to the provision of employment land within the Vale of Glamorgan, nor to the overarching objective of supporting economic growth and job creation. However, serious concerns remain as to whether the Model Farm site (SP14(2)) can realistically and credibly be relied upon as a deliverable employment allocation within the emerging RLDP period. These concerns relate to matters of soundness, deliverability, viability, market demand and unresolved technical constraints, as required to be assessed under national policy and guidance.

A summary of our main representations are as follows:
- The Stevens Family question the need for Model Farm to be included in the provision for 182 net ha of employment land for the requirement of 67.8 ha under Policy SP14. If the rollover allocation at Model Farm (Policy SP14(2)) was removed, then the provision would still allow for nearly doubling the projected employment land needs.
- Significant concern is raised regarding the 'rollover' Land South of Port Road, Rhoose (Model Farm) Employment Allocation (as part of SP14: Employment Growth) as deliverability is not sufficiently demonstrated by the Council and Representors. Currently there is significant ambiguity regarding the actual delivery, contrary to the Welsh Government's Development Plans Manual (DPM) Edition 3 requirements.
- The proposed Model Farm allocation is currently subject to an Appeal, having had the previous planning applications quashed by the High Court.
- It is inappropriate to allocate an employment site which has been proven to be unviable through detailed independent assessment which predicted a loss of £10,405,000 before interest, or £34,508,455M if interest costs were payable at 5%.
- Supporting evidence confirms that whilst the Representors suggest they remain committed, there is a huge contradiction as they also suggest that they are taking a "long-term view" about when the scheme might come forward.
- Serious questions are raised in terms of the employment demand and delivery for a 161,834 sqm floorspace development considering the current available space, low uptake over the last decade and availability of more attractive and better connected alternatives.
- When assessed against the Tests of Soundness CE2 & CE3, Policy SP14(2) fails to adequately justify Model Farm's continued inclusion in the Deposit Plan.
- There are a number of technical constraints which have not been addressed sufficiently via the planning application process, and these simply cannot be left to roll forward to the Local Development Plan.

Policy SP14 – Economic Growth
It is acknowledged that the RLDP must make adequate provision for employment land to meet forecast economic needs over the plan period and that a range of sites of differing scales and uses will be required.

Within the Preferred Strategy, Policy SP13 – Economic Growth outlined that the RLDP makes provision for 168 net ha to meet the projected employment land needs of 67.8 ha of employment land, including for B1 (Office and Light Industry), B2 (General Industries) and B8 (Distribution and Storage) employment uses which has the potential to support an additional 5,338 jobs over the plan period.

From a review of the current Deposit Plan, it is noted that employment growth is now assessed under Policy SP14 and that whilst the provision of jobs has not increased, The Stevens Family wish to highlight that the provision of proposed employment land has in fact increased to 182 ha. This is a result of an increase at both the major employment allocations at Bro Tathan Aerospace and Business Park (from 48.5 to 66.7 ha net) and Land to the South of Junction 34 of the M4, Hensol (29.59 to 36.23ha net).

Furthermore, the local employment allocations have also altered from the Preferred Strategy with, Atlantic Trading Estate, Barry (reduced from 6.21ha to 1.59 ha net); Vale Business Park, Llandow (reducing from 12.4 to 10.9 ha net); and Land at Llandow Trading Estate (1.85 ha net) replacing Land to the South of Junction 34 M4 Hensol (Area D 6.64 ha net).

Given this change, The Stevens Family question the actual need for SP14(2) Land south of Port Road (Model Farm), Rhoose. The total amount of employment space within the Vale has increased by 14 net ha by virtue of the amendments to Policy SP14, and in fact without the allocation of Model Farm would still provide 137.25 net ha which would still allow for nearly doubling the projected employment land needs of 67.8 ha of employment land.
Continued RLDP 'Rollover' Allocations

It is acknowledged that the RLDP must make adequate provision for employment land to meet forecast economic needs over the plan period and that a range of sites of differing scales and uses will be required. However, as noted above The Stevens Family consider that this can adequately be met without Model Farm. They reiterate some serious concerns over the deliverability of the rollover allocation, for reasons discussed below.
Welsh Government's Development Plans Manual (DPM) Edition 3 specifies that "Allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered (Boyer emphasis). The sites should be subject to the same candidate site process requirements as new sites i.e. they must be demonstrated to be sustainable and deliverable". Given that these factors are clearly set out within the latest version of the DPM reinforces their importance for the Welsh Government and the on-going need for Local Planning Authority's to demonstrate deliverability.

Having reviewed both the Preferred Strategy and the current Deposit Plan background technical evidence base there is nothing to indicate that the circumstances surrounding the Model Farm (Policy SP14(2)) have materially improved since the site was previously allocated. The site remains undelivered, subject to planning uncertainty following the quashing of the previous permission and current Appeal process, as well as being constrained by unresolved technical and infrastructure issues. The continued allocation therefore represents a rollover in the strictest sense, without the justification required by national policy.

Furthermore, Paragraph 6.270 of the Deposit Plan outlines that 'Land south of Port Road (Model Farm) Rhoose is currently subject to an appeal for non-determination of an outline planning application for a B1, B2, B8 Business. If the appeal is allowed (Boyer emphasis), the site is anticipated to deliver 1.7 million sq. ft of Class B1, B2 and B8 offices, light industrial and warehousing and distribution units, alongside car parking, landscaping, drainage infrastructure and biodiversity enhancement works which include land for expansion of Porthkerry Country Park to the south.

Clearly, the Quashed decision notice and the subsequent Appeal (which has been significantly delayed and only now looking to reopen in late March 2026) are important factors in the delivery of the employment allocation.
The Council, in their own words, note that the outcome of the Appeal impacts the anticipated delivery and therefore no decisions on the site's acceptability nor allocation should be taken forward until the Appeal is determined. This may not fit with the Council's timeframe for the RLDP, however the level of ambiguity on the actual delivery is so significant as to impact on the Council's ability to deliver their employment land and jobs over the plan period.
The distinct lack of actual timeframes and delivery is further outlined in the supporting Employment Land Study (March 2023 BP12) document. Paragraph 5.40 outlines that 'Model Farm is an employment proposal for Legal and General owned land in the east of the Land adjacent to Cardiff Airport and south of Port Road, Rhoose… Agents for Legal and General have confirmed that the investor remains committed to a development here but is taking a long term view about when the scheme might come forward (Boyer emphasis). It still sees strong potential here for a high-quality business cluster reinforced by Cardiff and Vale College's investment nearby. It has stated that there is a development partner for the project.
Paragraph 3.9 of the Employment Supplementary Paper (November 2025 BP12A) further outlines that 'Consideration will be given to the outcome of the Appeal decision and any implications this may have'.

The lack of evidence for the delivery is further illustrated in the Candidate Site Assessment at Preferred Strategy Stage (October 2023 BP 18) background paper in regard to Candidate Site 551 – Model Farm. The RAG Analysis system to assess sites against the Preferred Strategy (Appendix 2 of BP18) highlights that developer interest is coloured Amber which means that the Council themselves consider that the site accords with the strategy but there are some concerns around deliverability that would need to be addressed.

Evidently, there is a distinct lack of surety on the deliverability of the site, both from the current Appeal and the promoters in terms of timeframe. Moreover, what is conveniently ignored in all of the RLDP assessment is the unviable nature of the proposed allocation.

Viability/Deliverability
The Stevens Family have previously provided detailed comments on this issue in relation to the planning application (Ref: 2019/00871/OUT), however they continue to consider that the matter is of significant relevance to the proposed rollover allocation at Model Farm through the RLDP.
Given there has been no further information provided between the previous Preferred Strategy consultation and the current Deposit Plan, The Stevens Family reiterate that viability is a core determinant of deliverability and must be addressed at plan-making stage. The previously published RPS & Sutton Viability Assessment as well as the Avison Young independent review provided independent viability assessments relating to the quashed planning application and remain highly material. Those assessments demonstrated a substantial and structural viability deficit, even before accounting for interest costs. When realistic assumptions were applied, the deficit increased significantly, confirming that the scheme is not commercially viable.

Crucially, the evidence also illustrated that the development could not support policy-compliant infrastructure and mitigation requirements. Significant reductions in sustainable transport contributions and other obligations were required even to marginally improve viability. This is not a minor viability issue but a fundamental failure to support policy-compliant development.

In summary, the independent viability assessments prepared in relation to the site demonstrate that:
• The scheme generates a significant financial deficit (c. £10.4m without interest and c. £34.5m with interest);
• The development cannot viably support policy-compliant infrastructure or mitigation contributions; and
• Delivery would be dependent on substantial public sector intervention or gap funding, for which no commitment exists.

No updated viability evidence accompanies the Deposit RLDP to demonstrate that circumstances have materially changed. As viability is a core component of deliverability under the Development Plans Manual (Edition 3), the allocation cannot be considered effective or considered justified or deliverable.

Consequently, the demand, and indeed the appetite to construct such a development is highly questionable. Serious concern is raised as to why this information is not taken into consideration in Employment Land Study (March 2023 BP12) document and the update (November 2025 BP12A) as there is clear evidence of the unviable nature of the allocation.
The Stevens Family have considerable business/ commercial experience and seriously question why such an unviable and undeliverable allocation would be maintained, unless it was for a future alternative use.

Employment Need
The Stevens Family maintain that the scale of employment development proposed at Model Farm is not supported by historic or current market evidence.

The Employment Land Study (March 2023 BP12) demonstrates very modest employment floorspace take-up within the Vale of Glamorgan over the past decade. When compared to the quantum proposed at Model Farm alone, it is clear that the allocation assumes an absorption rate significantly exceeding historic trends. The Employment Land Study records that over the past decade approximately 83,950 sqm of industrial floorspace has been transacted across the Vale of Glamorgan. This is only around half of the floorspace proposed at Model Farm alone. Even under optimistic assumptions, the proposed floorspace would take well beyond the plan period to be absorbed. This introduces a high risk that the site would remain undeveloped or only partially developed by 2036, undermining the effectiveness of the RLDP. This is further Page evidenced by the Agents for Legal and General confirming that the investor is taking a long-term view about when the scheme might come forward. Demand for large-format B2 and B8 units has been particularly limited. Transactions for units exceeding 5,000 square metres are rare within the Vale of Glamorgan. The allocation therefore relies heavily on speculative demand that has not historically materialised. When assessed against average annual take-up rates:
• The proposed floorspace would take in excess of 20 years to be absorbed by the market, even if Model Farm were the only site available.
• This timeframe extends well beyond the plan period, directly conflicting with the requirement for effective delivery.

The evidence further shows that:
• There has been very limited demand for large-scale units exceeding 5,000 sqm within the Vale of Glamorgan;
• Only a single transaction of this scale occurred over a ten-year period; and
• Several of the unit sizes envisaged at Model Farm significantly exceed historic demand patterns.
In the surrounding context, the Cardiff Capital Region (CCR) £36 million investment at Aberthaw Power Station, brings into doubt the desirability of the Model Farm. The Study states that CCR have received a range of suggestions from business for uses on the site and is ultimately a more attractive opportunity for businesses and operations that Model Farm. Whilst it is acknowledged that there are on-going works required, the clear investment is evident at Aberthaw, which is in stark contrast to Model Farm and L&G's stance of a very long term view about when the scheme might come forward.

Test of Soundness
When assessed against the Tests of Soundness, Policy SP14(2) fails in several key respects.
• The allocation is not justified (CE2) because it is not supported by robust or proportionate evidence on viability or market demand and fails to demonstrate a substantial change in circumstances required for a rollover allocation.
The continued allocation of Model Farm is not justified by proportionate or robust evidence and the Development Plans Manual (Edition 3) is explicit that rollover allocations must demonstrate a substantial change in circumstances and be subject to the same scrutiny as new sites. No such change has been evidenced. Instead:
• The site remains undelivered;
• Viability evidence demonstrates a substantial financial deficit;
• Market demand assumptions appear optimistic when assessed against historic take-up data; and
• Multiple technical and environmental constraints remain unresolved.
In this context, the allocation of the site under Policy SP14(2) cannot be considered justified.
• The allocation is not effective (CE3) because there is no reasonable prospect of delivery within the plan period, and the site remains constrained by viability deficits, weak demand and unresolved delivery uncertainty.
For a plan to be sound it must be effective and capable of being delivered. The evidence demonstrates that this test is not met in respect of Model Farm (Policy SP14(2)).
The Employment Land Study (March 2023 BP12) and the Employment Supplementary Paper (November 2025 BP12A) confirm that the site promoter is taking a long-term view regarding delivery. This position is fundamentally incompatible with plan-making requirements, which demand a reasonable prospect that allocated sites will come forward within the plan period. There is no delivery programme, no agreed phasing strategy and no evidence of imminent implementation.
The Council's own Candidate Site Assessment (October 2023 BP 18) assigns the site an "Amber" rating for deliverability, acknowledging unresolved concerns. This confirms that uncertainty persists and that the site cannot be relied upon to deliver employment land between 2021 and 2036.

Taken together, these factors demonstrate that there is no reasonable prospect that the Model Farm site will deliver employment development between 2021 and 2036. As such, the allocation cannot be considered effective.

Technical Constraints
In addition to viability and market demand, The Stevens Family have continually reiterated that there are a number of technical constraints which have been highlighted in relation to the planning application, and which materially affect deliverability and reinforce concerns regarding soundness.

Drainage
Drainage remains a fundamental constraint. Concerns have previously been raised by statutory consultees (Dwr Cymru Welsh Water - DCWW) regarding insufficient capacity within existing foul sewerage infrastructure to accommodate development of this scale. A suitable point of connection has not been clearly identified, and there is no confirmed strategy demonstrating how capacity issues will be resolved.

The absence of a comprehensive Hydraulic Modelling Assessment is a significant evidential gap. For a site of this scale, drainage capacity is a prerequisite for delivery. Without certainty on foul and surface water solutions, the site cannot be considered deliverable.

Furthermore, proposed foul drainage routes continue to cross third-party land, including private residential land in the ownership of The Stevens Family. There is a significant conflict in the proposed route as it passes directly through an area of The Stevens Family land which has an extant consent for the reinstatement of a range of domestic garden buildings; the reinstatement and extension of adjoining south facing greenhouse; and the reconstruction of the terraced cold frames (application ref: 2020/01007/FUL – Granted November 2020). Following the discharge of relevant conditions the works on the reinstatement has commencement and is nearing completion. Clearly there is a significant conflict and it would be wholly unreasonable for The Stevens Family to undo any consented works for the sake of any future proposed drainage.

Furthermore, the route impacts sensitive ecological areas (including a SINC and Ancient Woodland), introducing legal, environmental and deliverability risks that have not been resolved at plan-making stage.
Transport

The site is acknowledged to be heavily reliant on off-site transport infrastructure improvements to mitigate its impact and promote sustainable travel. However, the viability evidence demonstrates that the development cannot support policy-compliant transport contributions.
The reliance on land transfer in lieu of financial contributions does not provide certainty that necessary infrastructure will be delivered, nor does it demonstrate compliance with national sustainable transport policy. This creates a clear disconnect between policy aspirations and realistic delivery.

A strategic employment allocation that cannot viably deliver sustainable transport mitigation is inherently unsound.

Ecology
The site is subject to significant ecological constraints, including impacts on SINCs, Ancient Woodland and habitats supporting protected species. Previous ecological assessments provided by The Stevens Family have identified the

potential presence of species such as Great Crested Newts and Dormice, and concerns remain regarding habitat loss and fragmentation.

These constraints were reflected in the Candidate Site Assessment, where the site scored “Red” in relation to impacts on SINCs and Local Nature Reserves and “Amber” across a wide range of environmental criteria. The scale of mitigation required has direct implications for both viability and deliverability and has not been adequately addressed in the evidence base.

Given the significance of the ecological constraints then it is considered that there are still further works required to evidence the allocation of the site. In particular this relates to the concerns around the Habitat Suitability Index (HSI), assessment of the on-site pond for its suitability for Great Crested Newts (GCN) as well as Dormice.

It is considered that this information should be provided now as part of the allocation process as it has significant implications.

Furthermore, The Stevens Family also note that the recently passed Environment (Principles, Governance and Biodiversity Targets) (Wales) Bill establishes a strengthened framework for environmental protection in Wales by embedding key environmental principles such as the precautionary principle, prevention of environmental harm, rectification at source and the polluter pays principle into Welsh law and requiring public authorities to apply them in policy and decision-making. It also introduces a new environmental governance system, including the Office of Environmental Governance Wales, and enables Welsh Ministers to set legally binding biodiversity targets aimed at halting and reversing the decline of nature, increasing native species and improving ecosystem resilience.

In this context, the proposed employment allocation of Model Farm, under Policy SP14(2), should be carefully reconsidered where there is no clear demonstrable need for the allocation. The principles embedded in the Bill emphasise preventative action and the integration of environmental protection into policy decisions, meaning that avoidable harm to biodiversity should be prevented wherever possible. Where development would result in the loss or degradation of habitats and ecological networks, and the allocation is not required to meet identified employment needs, protecting the site from development would better align with the Bill’s objectives to safeguard ecosystems and contribute to reversing biodiversity decline in Wales.

Cumulative Impact of Constraints
Individually, each of the above constraints presents a challenge. Collectively, they demonstrate that Model Farm is a highly constrained site with no clear pathway to resolution. The cumulative impact of drainage, transport, ecological and environmental constraints further undermines the assumption that the site can be viably and effectively delivered within the plan period.
Candidate Site Assessment at Preferred Strategy Stage (October 2023 BP 18)

As highlighted, the proposed Candidate Site 551 (Model Farm) has undertaken a RAG Analysis system to assess sites against the Preferred Strategy (Appendix 2 of BP18). Whilst it has already been noted that the site scored Amber in terms of deliverability (meaning that the Council themselves consider that the site raises concerns around deliverability that would need to be addressed), there are a number of other concerns raised where there is a distinct lack of evidence for the delivery of the site.

In particular, it is illustrated that the site scored Red (does not accord with the strategy) in regard to the direct impact on surrounding SINCs and Local Nature Reserves and is a significant factor that needs addressing to allow any rollover allocation.

Furthermore, in terms of the Amber scores, the following are highlighted as raising concern for the Authority and which need to be addressed:
- Agricultural Land
- Mineral Resource
- Green Wedge Designation
- Special Landscape Areas
- Contaminated Land
- Existing Physical Site Constraints
- Historic Environment

Given the significant amount of Amber scores, it is clearly demonstrated that the Model Farm site has a number of issues which need to be fully assessed and with no apparent solutions or updates, then The Stevens Family seriously question the validity of the proposed rollover allocation at Model Farm.

Summary
In summary, The Stevens Family have strong reservations regarding the proposed rollover allocation at Model Farm under Policy SP14(2), many of which have been previously raised and continue to be unaddressed by the evidence base underpinning the Deposit Plan.
It has been demonstrated that even without the allocation of Model Farm the Deposit Plan would still provide 137.25 net ha which would be nearly double the projected Vale employment land needs of 67.8 ha.

There are significant deliverability concerns, not only with the evidenced lack of viability (as independently assessed), but also demand. It is considered that when assessed against the Tests of Soundness, Policy SP14(2) – Model Farm, fails in several key respects.
In particular, the proposed rollover allocation is not justified under Test of Soundness CE2 because it is not clearly supported by robust or proportionate evidence on viability or market demand and fails to demonstrate a substantial change in circumstances required for a rollover allocation.
Furthermore, the allocation is not effective under Test of Soundness CE3 because there is no reasonable prospect of delivery within the plan period (as suggested by the promoters that they are taking a long-term view), and the site remains constrained by viability deficits, weak demand and unresolved delivery uncertainty.

The Stevens Family consider that the rollover allocation of the site is contrary to the Welsh Government's Development Plans Manual (DPM) Edition 3 and does not substantially evidence any deliverability.

It is considered that the Model Farm (Policy SP14(2)) Employment allocation should not be rolled forward into the Replacement LDP, and rather it would be more appropriate to de-allocate for sites with much more certainty.

Moreover, there still remains concerns regarding drainage, transport, and ecology and the distinct lack of any evidence base update to prove otherwise. This is supported by the Councils own assessment as part of the Candidate Site Assessment at Preferred Strategy Stage (October 2023 BP 18) background paper which maintained an Amber score for a number of issues which, by the Councils own admission, identifies concerns around deliverability that would need to be addressed.

Overall, there remains serious questions as to how such an unviable scheme can even be considered for a rollover allocation.

Change suggested by respondent:

It is considered that the Model Farm (Policy SP14(2)) Employment allocation should not be rolled forward into the Replacement LDP, and rather it would be more appropriate to de-allocate for sites with much more certainty.

Sound: No

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3vm

6968 Comment

Document Element: SP14 - EMPLOYMENT GROWTH

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the 'domestic' supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))

Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
Our representations on the site allocations are included in appendix 2.
We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the ‘domestic’ supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome

provision within this policy to integrate green infrastructure with sustainable drainage systems.
Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site
Our representations on site allocations are provided in the table below. The following caveats are applicable to all sites:
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion.
• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
The following provisions are applicable to all allocated employment sites:
• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
• Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcements.
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:
Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

7003 Comment

Document Element: Land east of Cardiff

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Water Supply - 100mm, 160mm & 300mm diameter watermains crossing the site.
Sewerage - 150mm sewer, 225mm surface water sewer & 250mm diameter pressurised rising main crossing the site. Tredogan Sewage Pumping Station is located within the site, and we would recommend that the LPA discuss the potential allocation with their Environmental Health Department. To avoid the potential for noise or odour nuisance for future occupiers it is strongly recommended that any properties are positioned a minimum of 15 metres away from the asset.
Wastewater Treatment Works (WwTW) - The site is in Cog Moors WwTW catchment.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of

connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
Our representations on the site allocations are included in appendix 2.
We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the 'domestic' supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.
Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site
Our representations on site allocations are provided in the table below. The following caveats are applicable to all sites:
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion.
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See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
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See tables in attachments for site specific comments

Change suggested by respondent:

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Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

7004 Comment

Document Element: Land south of Port Road

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Water Supply - 4" & 9" diameter watermains crossing the site.
Sewerage - 375mm diameter foul sewer, and a 100mm diameter pressurised rising main sewer crossing the site.
Wastewater Treatment Works (WwTW) - The site is in Cog Moors WwTW catchment.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)

Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
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Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
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We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the ‘domestic’ supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
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Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
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See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
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• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

7005 Comment

Document Element: Bro Tathan Aerospace and

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Water Supply - 90mm diameter watermain crosses the site.
Sewerage - 150mm & 300mm diameter foul sewers, and 100mm & 125mm pressurised rising main sewers crossing the site.
Wastewater Treatment Works (WwTW) - The site is between Llantwit Major & West Aberthaw WwTW catchments.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
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D. Housing led redevelopment opportunity (HG3 (1))
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E. Rural affordable housing led sites (HG4 (1) to HG4(4))
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Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
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• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.

• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
The following provisions are applicable to all allocated employment sites:
• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
• Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcements.
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

7006 Comment

Document Element: Land to the South of

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Water Supply - 450mm diameter watermain crossing the site.
Sewerage - 750mm diameter foul sewer crossing the site.
Wastewater Treatment Works (WwTW) - The site is in Coslech WwTW catchment.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries

SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
Our representations on the site allocations are included in appendix 2.
We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the ‘domestic’ supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.

EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.
Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site
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See tables in attachment for site specific comments.

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1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
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• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

7007 Comment

Document Element: Atlantic Trading Estate,

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Water Supply - No watermains crossing the site.
Sewerage - North parcel – 375mm, 1050mm diameter foul sewers, and Combined Sewer Overflow and 825mm diameter outfall pipe crossing the site. South parcel – 150mm diameter foul sewer crossing the site.
Wastewater Treatment Works (WwTW) - The site is in Cog Moors WwTW catchment.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
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Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
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B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
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E. Rural affordable housing led sites (HG4 (1) to HG4(4))
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Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision

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CI3 – new community facilities
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CI5 - cemetery and crematorium provision
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EMP1 - employment regeneration opportunity areas
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accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
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See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
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See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

7008 Comment

Document Element: Windmill Park, Hayes Road,

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Water Supply - No watermains crossing the site.
Sewerage - 225mm diameter foul sewer crossing the site. Wastewater Treatment Works (WwTW) - The site is in Cog Moors WwTW catchment.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
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Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
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B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
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D. Housing led redevelopment opportunity (HG3 (1))
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E. Rural affordable housing led sites (HG4 (1) to HG4(4))
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Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
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Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
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• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion.
• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
The following provisions are applicable to all allocated employment sites:

• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
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• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

7009 Comment

Document Element: Vale Business Park, Llandow

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Water Supply - No watermains crossing the site.
Sewerage - There are no public sewers close to this site.
Wastewater Treatment Works (WwTW) - N/a.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater

for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
Our representations on the site allocations are included in appendix 2.
We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the ‘domestic’ supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.
Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then

please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

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Appendix 2 - Employment sites & other uses
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Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

7010 Comment

Document Element: Land at Llandow Trading

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Water Supply - 160mm diameter watermain crossing the site.
Sewerage - There are no public sewers close to this site.
Wastewater Treatment Works (WwTW) - N/a.

Full text:

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See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

5394 Object

Document Element: Former Aberthaw Power Station

Respondent: Emma Reed [2653]

Summary:

Lack of detail of traffic implications when combined with other committed and proposed developments in the area. A full proper impact assessment is needed as of 2025 not done in 2022 as outdated by COVID.

Full text:

LAck of detail of traffic implications when combined with other committed and proposed developments in the area. A full proper impact assessment is needed as of 2025 not done in 2022 as outdated by COVID.

Change suggested by respondent:

More detail is needed on the transport implications of this large employment site. The likely traffic generation needs to be added to other developments in the area including land at Readers Way and Weycock Cross.

Sound: No

Attachments: None

5437 Comment

Document Element: Former Aberthaw Power Station

Respondent: Mrs Susan Evans [712]

Summary:

There is insufficient detail of the impact of this proposal on the local SSI and highway network which is already overburdened in the area.

Full text:

There is insufficient detail of the impact of this proposal on the local SSI and highway network which is already overburdened in the area.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5551 Object

Document Element: Land at the Port of Barry

Respondent: Mr Corrado Ruta [2774]

Summary:

I object to the proposed development of the area east of Sully Moors because it goes against the Objective 1 - Mitigating and Adapting to Climate Change as the area is in a flood plain and regularly gets flooded during/after heavy rainfalls. It also goes against Objective 5 – Protecting and Enhancing the Natural Environment and Objective 2 - Improving Mental and Physical Health and Well-being because the area is part of Sully heritage rural setting and crossed by a public right of way for local walkers.

Full text:

I object to the proposed development of the area east of Sully Moors because it goes against the Objective 1 - Mitigating and Adapting to Climate Change as the area is in a flood plain and regularly gets flooded during/after heavy rainfalls. It also goes against Objective 5 – Protecting and Enhancing the Natural Environment and Objective 2 - Improving Mental and Physical Health and Well-being because the area is part of Sully heritage rural setting and crossed by a public right of way for local walkers.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5708 Support

Document Element: Former Aberthaw Power Station

Respondent: Cardiff Capital Region Energy (Mr Phil Nightingale, Project Delivery Director) [2736]

Summary:

CCR Energy strongly supports Policy EMP1 and the designation of the former Aberthaw Power Station as a Green Energy, Employment and Innovation Park. The redevelopment will create a regionally significant hub for renewable and low-carbon energy, zero-carbon manufacturing, and innovation, delivering high-quality skilled jobs, training, and education opportunities. The proposals integrate sustainable land use, biodiversity enhancements, green infrastructure, flood risk mitigation, and support the circular economy. Phased development, masterplanning, and stakeholder engagement ensure a comprehensive approach, safeguarding adjacent communities and the East Aberthaw Coast SSSI, while maximising sustainable transport connections and contributing significantly to decarbonisation and the Vale's green economy.

Full text:

CCR Energy strongly supports Policy EMP1 and the designation of the former Aberthaw Power Station as a Green Energy, Employment and Innovation Park. The redevelopment will create a regionally significant hub for renewable and low-carbon energy, zero-carbon manufacturing, and innovation, delivering high-quality skilled jobs, training, and education opportunities. The proposals integrate sustainable land use, biodiversity enhancements, green infrastructure, flood risk mitigation, and support the circular economy. Phased development, masterplanning, and stakeholder engagement ensure a comprehensive approach, safeguarding adjacent communities and the East Aberthaw Coast SSSI, while maximising sustainable transport connections and contributing significantly to decarbonisation and the Vale's green economy.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5785 Support

Document Element: Former Aberthaw Power Station

Respondent: Mrs Gail kirkham [1596]

Summary:

Much needed. An eyesore at the moment.

Full text:

Much needed. An eyesore at the moment.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5786 Support

Document Element: Land at the Port of Barry

Respondent: Mrs Gail kirkham [1596]

Summary:

Excellent proposal

Full text:

Excellent proposal

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5880 Object

Document Element: Land at the Port of Barry

Respondent: Mrs Elizabeth Rudman [3410]

Summary:

Will increase conjestion along port road

Full text:

Will increase conjestion along port road

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6004 Comment

Document Element: Former Aberthaw Power Station

Respondent: Councillor Samantha Campbell [1002]

Summary:

Clarification needs to be sourced on the future of this development as to key players in the future investment, and stakeholders as it is now visible currently.

Full text:

Clarification needs to be sourced on the future of this development as to key players in the future investment, and stakeholders as it is now visible currently.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6234 Comment

Document Element: Land at the Port of Barry

Respondent: Associated British Ports (Mr Will Ryan, Land & Planning Manager) [2477]

Summary:

ABP fully supports this policy and looks forward to working constructively alongside VoGC and other key stakeholders to realise the opportunities that the Port of Barry can deliver for the town, the Vale of Glamorgan and the Wales economies.

In order to reflect the current circumstances, it is proposed that paragraph 6.283 is amended to read as follows:

6.283 The plans for the Port of Barry represent the next stage in the regeneration of Barry Docks and focusses on enhancing the docks' future economic role. The identification of the area as an Employment Regeneration Opportunity Area reflects the vision and aspirations of ABP contained within its emerging long-term strategy. This will set out the employment areas and operational port land at the Port and focus on developing the port around low and zero carbon sectors alongside traditional marine related industrial uses.

Full text:

ABP fully supports this policy and looks forward to working constructively alongside VoGC and other key stakeholders to realise the opportunities that the Port of Barry can deliver for the town, the Vale of Glamorgan and the Wales economies.

In order to reflect the current circumstances, it is proposed that paragraph 6.283 is amended to read as follows:

6.283 The plans for the Port of Barry represent the next stage in the regeneration of Barry Docks and focusses on enhancing the docks' future economic role. The identification of the area as an Employment Regeneration Opportunity Area reflects the vision and aspirations of ABP contained within its emerging long-term strategy. This will set out the employment areas and operational port land at the Port and focus on developing the port around low and zero carbon sectors alongside traditional marine related industrial uses.

Change suggested by respondent:

In order to reflect the current circumstances, it is proposed that paragraph 6.283 is amended to read as follows:

6.283 The plans for the Port of Barry represent the next stage in the regeneration of Barry Docks and focusses on enhancing the docks' future economic role. The identification of the area as an Employment Regeneration Opportunity Area reflects the vision and aspirations of ABP contained within its emerging long-term strategy. This will set out the employment areas and operational port land at the Port and focus on developing the port around low and zero carbon sectors alongside traditional marine related industrial uses.

Sound: Not specified

Attachments: None

6648 Object

Document Element: Former Aberthaw Power Station

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites

especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.

General Approach to Designated Sites

In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.

We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.

By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.

We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be

helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites

within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.

With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.

Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the

Green Infrastructure Strategy (GIS) which incorporates the GIA.

It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of “areas of high ecological value” will also go some way towards resolving the points we raise.

Master Planning

We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site

specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.

Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration

at the project/planning application level and in master planning.

Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.

Strategic Opportunity at Bro Tathan

In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already

made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.

This will ensure that development in the area:

• does not cause detriment to the maintenance of the favourable conservation status of protected species;

• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.

Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.

Areas of High Ecological Value

As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding

areas of ‘High Ecological Value’ (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.

2. Integrated Sustainability Assessment (ISA)

With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative

effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of

nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure
Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological
connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to ‘6 broad habitat types’ including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to ‘6 broad ecosystems’ to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP’s Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity

provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on

the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it “is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary”.
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW’s Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of ‘Policy DNP8 – Severn Estuary Recreational
Pressure’ within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of ‘Policy DNP8 – Severn Estuary Recreational Pressure’ within the deposit plan, which as above, we advise needs
clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome

reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

6823 Object

Document Element: Former Aberthaw Power Station

Respondent: National Grid Electricity Transmission (Planning Enquiries) [582]

Summary:

A significant number of NGET assets – including substations – fall within Employment Opportunity Area 1.

NGET do not consider that proposals of EMP1 are necessarily in conflict with these assets and are keen to ensure development is able to come forward even where its assets are present within or adjacent to an allocation. However, it is critical that the presence of these assets is suitably addressed within the supporting policy wording if Policy EMP1 is to be considered effective as otherwise the presence of NGET assets without appropriate acknowledgement will amount to significant constraints on site delivery. In particular, the electrical substations require 24/7 access including for 'abnormal indivisible loads' (AIL) and the land immediately surrounding them is also critical to their safe and secure functioning and to accommodate any change in future requirements which may arise.

It is acknowledged that, as part of masterplanning principles set out at 6.281, the policy already makes mention of existing infrastructure assets within the site and a need for a site layout to be developed that considers the sites existing infrastructure (including electrical substations) however we consider that the policy needs to go further and acknowledge the wider range of NGET assets that are within the site as well as more clearly establish how any future development needs to respond to the presence of NGET assets within the site. With this in mind, we propose the following wording, or wording to similar effect which directly references the full range of NGET assets and specific design guide and principles be added to the list of masterplanning principles as a separate point:

"Development will include a strategy for responding to the NGET Substations, Overhead and Underground Cable Routes present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."

Without appropriate acknowledgement of the NGET assets present within the sites, Policy EMP1 should not be considered effective as it cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure. As such, NGET object to the policy as currently drafted.

Full text:

Vale of Glamorgan Replacement Local Development Plan 2021-2036: Deposit Plan Consultation – March 2026
Representations on behalf of National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission has appointed Fisher German LLP to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission (NGET)

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. NGET manage not only today's highly complex network but also to enable the electricity system of tomorrow. Their work involves building and maintaining the electricity transmission network – safely, reliably and efficiently. NGET connect sources of electricity generation to the network and transport it onwards to the distribution system so it can reach homes and businesses.

National Grid Electricity Distribution (NGED) are the electricity distribution division of National Grid and are separate from National Grid Electricity Transmission's core regulated businesses. Please also consult with NGED separately from NGET.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

National Energy System Operator (NESO) has taken over the electricity and gas network planning responsibility from National Grid Electricity System Operator Limited (NGESO) as of 1st October 2024. Early engagement with NESO is recommended in order to establish available supply capacity to any potential development sites and what, if any, reinforcement is required to ensure adequate continued supply. Please consult with NESO separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets

Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed by or in close proximity to NGET assets. Details of the sites affecting NGET assets are provided below.

Development Plan Document Site Asset Description

Policy EMP1 (Employment Regeneration Opportunity Area 1) (site 433 on candidate sites map)
Aberthaw leasehold land
ABERTHAW 132KV S/S
ABERTHAW 275KV S/S
SGT2 275KV CABLE: ABERTHAW 275KV S/S
UPPER BOAT 1 275kV CABLE: ABERTHAW 275KV S/S
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 516 (Renewable Energy)
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 577 (Renewable Energy)
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 513 (Renewable Energy)
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 511 (Renewable Energy)
ZZB ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - UPPER BOAT 1 and ABERTHAW - UPPER BOAT 2
ZZS ROUTE: 275kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE and ABERTHAW – PYLE

Candidate site 517 (Renewable Energy)
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA

Candidate site 515 (Renewable Energy)
LL ROUTE: 275kv Overhead Transmission Line route: ABERTHAW – TREMORFA

A plan showing details of NGET assets is attached to this letter. Please note that this plan is illustrative only. NGET also provides information in relation to its assets at the website below.
https://www.nationalgrid.com/electricity-transmission/network-and-infrastructure/network-route-maps

NGET Electricity Network Infrastructure

The security and reliability of the UK's current and future energy supply is highly dependent on having an electricity network which will enable the existing and new electricity generation, storage, and interconnection infrastructure that the country needs to meet the rapid increase in electricity demand required to transition to net zero, while maintaining energy security.

In general, NGET does not own the land crossed by its overhead lines but has responsibility for maintaining the equipment and safe supply of electricity. The increasing pressure for development is leading to more development sites being brought forward through the planning process on land that is crossed by NGET assets.

Despite this NGET is not a statutory consultee in the plan-making process but it is recommended that NGET are consulted at the earliest possible opportunity in order that advice and guidance can be taken into account on development near overhead lines, or wider policies that may affect the existing or future supply of electricity.

With the above context in mind, the Council should ensure that development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement or future network expansion. The Council should safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations and resist development or highway alterations that would prejudice, constrain or render impractical AIL access unless suitable mitigation or alternative agreed routes can be secured.

Interactions Commentary

NGET advocates the high standards of design and sustainable development forms promoted through national planning policy and understands that contemporary planning and urban design agenda require a creative approach to new development around high voltage overhead lines and other NGET assets.

Policy EMP1 (Employment Regeneration Opportunity Area 1) (site 433 on candidate sites map)
A significant number of NGET assets – including substations – fall within Employment Opportunity Area 1, as designated within Policy EMP1. This site also appears as site 433 on the candidate sites map.

NGET do not consider that proposals of EMP1 are necessarily in conflict with these assets and are keen to ensure development is able to come forward even where its assets are present within or adjacent to an allocation. However, it is critical that the presence of these assets is suitably addressed within the supporting policy wording if Policy EMP1 is to be considered effective as otherwise the presence of NGET assets without appropriate acknowledgement will amount to significant constraints on site delivery. In particular, the electrical substations require 24/7 access including for 'abnormal indivisible loads' (AIL) and the land immediately surrounding them is also critical to their safe and secure functioning and to accommodate any change in future requirements which may arise.

It is acknowledged that, as part of masterplanning principles set out at 6.281, the policy already makes mention of existing infrastructure assets within the site and a need for a site layout to be developed that considers the sites existing infrastructure (including electrical substations) however we consider that the policy needs to go further and acknowledge the wider range of NGET assets that are within the site as well as more clearly establish how any future development needs to respond to the presence of NGET assets within the site. With this in mind, we propose the following wording, or wording to similar effect which directly references the full range of NGET assets and specific design guide and principles be added to the list of masterplanning principles as a separate point:

"Development will include a strategy for responding to the NGET Substations, Overhead and Underground Cable Routes present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."

Without appropriate acknowledgement of the NGET assets present within the sites, Policy EMP1 should not be considered effective as it cannot be delivered as proposed; unencumbered by the constraints posed by the presence of NGET infrastructure. As such, NGET object to the policy as currently drafted.

Renewable Energy Candidate Sites

A number of 'candidate sites' as included on the candidate site mapping, as listed in the above table, have NGET assets interacting with them. Whilst it is not clear what their future role as part of the Local Plan will be (they do not currently form part of the Proposals Map as published), NGET are keen to highlight these interactions so that, as with Policy EMP1 above, suitable policy wording can be included as part of any future development options on these sites, should they emerge as allocations in the future.

New Infrastructure

Demand for electricity is expected to rise significantly as the way we power homes, businesses and transport evolves. As

the UK transitions towards net zero, fossil fuels will be replaced by increasing volumes of low-carbon electricity, including from offshore wind and other renewable sources.

The UK Government has committed to achieving net zero emissions by 2050, requiring a balanced approach to greenhouse gas emissions and removals. Decarbonising the energy system is central to meeting this national objective.

National Grid Electricity Transmission (NGET) is delivering a range of infrastructure projects across England and Wales to support this energy transition and ensure that the transmission network can accommodate the rapid growth in low-carbon generation.

The way NGET generates electricity in the UK is changing rapidly, and NGET are transitioning to cheaper, cleaner and more secure forms of renewable energy. NGET need to make changes to the network of overhead lines, pylons, cables and other infrastructure that transports electricity around the country, so that everyone has access to clean electricity from these new renewable sources. These changes include a need to increase the capability of the electricity transmission system between the North and the Midlands, and between the Midlands and the South. It is also needed to facilitate the connection of proposed new offshore wind, and subsea connections between England and Scotland, and between the UK and other countries across the North Sea. Taking this context into account, In planning for the area the Council should:

• Safeguard all existing NGET transmission assets, including overhead lines, underground cables and substations.
• Support future reinforcement and expansion, including works required for the Great Grid Upgrade and other strategic national infrastructure projects.
• Ensure development proposals located near transmission assets demonstrate that they will not compromise safety, operability, maintenance access, asset replacement, or future network expansion.
• Safeguard existing and potential access routes required for the delivery and removal of Abnormal Indivisible Loads (AILs) associated with the construction, replacement and maintenance of transmission-scale equipment, including large transformers at strategic substations.
• Resist development or highway alterations that would prejudice, constrain or render impracticable AIL access, unless suitable mitigation or alternative agreed routes can be secured.
• Encourage early engagement with NGET to identify and resolve any potential impacts at the earliest possible stage of the planning process.

Protecting existing assets and enabling future network development will ensure that the Council contributes effectively to national decarbonisation targets while supporting local growth, resilience and energy security.

Further Advice

NGET is happy to provide advice and guidance to the Council concerning their networks. Please see attached information outlining further guidance on development close to National Grid assets.
If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.
To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, NGET wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult NGET on any Development Plan Document (DPD) or site-specific proposals that could affect our assets.
We would be grateful if you could add our details shown below to your consultation database, if not already included.

Further Guidance

NGET is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets.
Developers of sites crossed or in close proximity to NGET assets should be aware that it is NGET policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance.
NGET's 'Design guidelines for development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgrid.com/document/345326/download
The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site.
NGET's statutory safety clearances are detailed in their Technical Guidance Note 'Third-party guidance for working near National Grid Electricity Transmission equipment', which can be downloaded here:
https://www.nationalgrid.com/document/349291/download
How to contact NGET
If you require any further information in relation to the above and/or if you would like to check if NGET's transmission networks may be affected by a proposed development, please visit the website: https://lsbud.co.uk/

Change suggested by respondent:

We propose the following wording, or wording to similar effect which directly references the full range of NGET assets and specific design guide and principles be added to the list of masterplanning principles as a separate point:

"Development will include a strategy for responding to the NGET Substations, Overhead and Underground Cable Routes present within the site which demonstrates how the NGET Design Guide and Principles have been applied at the masterplanning stage and how the impact of the assets has been reduced through good design."

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3hb

7011 Comment

Document Element: Former Aberthaw Power Station

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Water Supply - The allocation covers a substantial area of land and there are numerous existing assets crossing the area.
Sewerage - The allocation covers a substantial area of land and there are numerous existing assets crossing the area.
Wastewater Treatment Works (WwTW0 - The site is between East Aberthaw & West Aberthaw WwTW catchments.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be

undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
Our representations on the site allocations are included in appendix 2.
We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the 'domestic' supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.
Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site
Our representations on site allocations are provided in the table below. The following caveats are applicable to all sites:
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion.
• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the

requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
The following provisions are applicable to all allocated employment sites:
• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
• Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcements.
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

7012 Comment

Document Element: Land at the Port of Barry

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

Water Supply - The allocation covers a substantial area of land and there are numerous existing assets crossing the area.
Sewerage - The allocation covers a substantial area of land and there are numerous existing assets crossing the area.
Wastewater Treatment Works (WwTW) -The site is in Cog Moors WwTW catchment.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure

provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
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We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the ‘domestic’ supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.

Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.
Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site
Our representations on site allocations are provided in the table below. The following caveats are applicable to all sites:
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion.
• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
The following provisions are applicable to all allocated employment sites:
• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where

there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
• Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcements.
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

5784 Support

Document Element: EMP2 - MOD ST ATHAN
Respondent: Mrs Gail kirkham [1596]

Summary:

MOD St Athan is the obvious place for further development in this area. So much brown field land to develop and provide much needed employment in the area. I support.

Full text:

MOD St Athan is the obvious place for further development in this area. So much brown field land to develop and provide much needed employment in the area. I support.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

6684 Comment

Document Element: EMP2 - MOD ST ATHAN
Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.
We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.
Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.
Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the

exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where "qualifying activities" take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.

Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states 'The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.'
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery.
Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)

identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.
South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with

Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against

Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated,

resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com

South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

6700 Comment

Document Element: EMP2 - MOD ST ATHAN

Respondent: Ministry of Defence (Mr Chris Waldron, DIO Assistant Safeguarding Manager) [690]

Summary:

The MOD notes and welcomes the intentions of Policy EMP2: MOD ST ATHAN. However, it is recommended that additional wording is added to make clear that this policy relates to the safeguarded MOD technical site.

Tall or narrow profile structures such as masts or flue stacks with a height of 50m or greater above ground level may introduce obstruction hazards to low flying military aircraft using the UK military low flying system.

Full text:

It is understood that Vale of Glamorgan Council are undertaking a Deposit Plan consultation regarding their proposed replacement Local Development Plan 2021 - 2036. This consultation details the overall Strategy, development policies, areas to be protected, and specific land allocations for development (including new housing, employment) over the 15-year period
The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.
The Welsh Government's Development Management Manual as revised May 2025, identifies, at figure 7, that a number of non-site-specific directions are currently in force, the list includes the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002. Through this direction the MOD is involved in the planning system as a statutory consultee. Statutory consultation occurs as a result of the provisions of the Direction, and the plans issued to Local Planning Authorities by the Welsh Government, which are provided by MOD.
The area covered by any Vale of Glamorgan Council Local Plan is partially covered by a safeguarding zone that is designated to maintain the effective operation of a MOD technical site that is retained at St Athan, at which is located a High-Resolution Direction Finder (HRDF) technical asset. This is a navigational aid which serves to maintain air traffic safety.
To illustrate the various issues that might be fundamental to MOD safeguarding assessments, a brief summary of the technical safeguarding zone is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.
The dimensions and materials used in the construction of a development may be relevant factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to introduce large expanses of metal or electrical noise interference, which may be a particular issue where solar farms are developed.
The MOD notes and welcomes the intentions of Policy EMP2: MOD ST ATHAN. However, it is recommended that

additional wording is added to make clear that this policy relates to the safeguarded MOD technical site. Therefore, it is recommended that wording is updated. “New development within or adjoining MOD St Athan and the safeguarded MOD technical site that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. Proposals for non-military or non-defence related development within or in the areas around MOD St Athan, or the safeguarded MOD technical site will not be supported where it would adversely affect military operations or capability, unless it can be demonstrated that there is no longer a defence or military need for the site.”
Where development falls outside designated safeguarding zones the MOD may have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to:
Tall or narrow profile structures such as masts or flue stacks with a height of 50m or greater above ground level may introduce obstruction hazards to low flying military aircraft using the UK military low flying system.
The MOD also needs to be consulted on all proposals to develop wind turbines that are 11m or greater in height to blade tip or, that have a rotor diameter of 2m or greater. This is necessary to safeguard defence radar coverage across the UK used to manage MOD ranges, provide air traffic control and maintain UK air defence.
The MOD notes that Draft Policy CC3 assigns the renewable energy local search areas that have been defined in the deposit plan. This supports the generation of non-domestic renewable, low and zero carbon energy. The Renewable Energy assessment from 2023 identifies potential opportunity areas for renewable energy and provides a high-level assessment of wind and solar energy resource within the Vale of Glamorgan and identifies several sites, known as ‘search areas’ where the potential for development is greatest, and identification of 20 of the largest sites for both wind and solar.
Draft policy CC4 defines requirements that any development will need to demonstrate compatibility with. It is noted that specific reference to aviation safeguarding is included. However, the MOD considers it necessary that this is expanded to include specific reference to those technical assets which facilitate aviation safety such as navigational aids. In addition, the MOD also considers it necessary that specific mention of the need to account for defence radar coverage in relation to wind energy development is specifically identified.
In principle, the MOD has no objection to any renewable energy development occurring in the renewable energy local search areas that have been defined, subject to confirming that that it will be compatible with defence safeguarding requirements.
Some renewable energy generation infrastructure, for example wind turbine generators can, by virtue of their physical dimensions and properties, impact upon the effective operation of safeguarded defence technical installations. Solar farm developments located in proximity to safeguarded navigational aids, or other types of technical sites, can impact upon their effective operation by introducing substantial areas of metallic types of surfaces that may affect transmissions.
Where turbines are erected in line of sight to defence radars, the rotating motion of their blades can degrade and cause interference to their effective operation.
The MOD recommend that any emerging policy makes clear that, where an MOD assessment indicates that a development would have a detrimental impact on the operation and capability of defence assets or sites, that such an application would be refused or that conditions may be attached to any consent that might be issued which may include the removal of permitted development rights.
For your convenience, please find a table at Appendix A which provides a summary of the safeguarding criteria that would apply to those potential development housing allocations identified. MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. The table below provides a summary of those sites and the triggers for statutory safeguarding consultation that would apply:
I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.
Appendix A
Policy HG1 KS4 - MOD St Athan (technical safeguarding zone)
• Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement
• Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement
Policy HG1 KS5 - MOD St Athan (technical safeguarding zone)
• Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement
• Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement
Policy HG1(7) - MOD St Athan (technical safeguarding zone)
• Any development or change of use will trigger statutory consultation requirement
• Development of, or exceeding, 10.7m in height above ground level will trigger statutory consultation requirement
Policy HG1(8) - MOD St Athan (technical safeguarding zone)
• Any development or change of use will trigger statutory consultation requirement

Change suggested by respondent:

It is recommended that wording is updated as follows “New development within or adjoining MOD St Athan and the safeguarded MOD technical site that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. Proposals for non-military or non-defence related development within or in the areas around MOD St Athan, or the safeguarded MOD technical site will not be supported where it would adversely affect military operations or capability, unless it can be demonstrated that there is no longer a defence or military need for the site.”

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/36v

5191 Comment

Document Element: EMP3 - PROTECTION OF EXISTING EMPLOYMENT SITES AND PREMISES
Respondent: Welsh Government (Economy, Treasury and Constitution Group - Property Infrastructure) [1213]
Agent: CarneySweeney

Summary:

We write to comment and seek amendments to Policy EMP3 'PROTECTION OF EXISTING EMPLOYMENT SITES AND PREMISES'.

We note that while the the title of Policy EMP3 refers to 'existing employment sites and premises', it is clear form the text of the policy that it also applies to 'Major Employment Sites'. The Proposals Map identifies 'existing employment' and 'major employment' sites separately and with different boundaries, such that 'major employment' sites includes land which is not an existing employment location (eg land at Bro Tathan North as well as land at Cardiff Airport).

In order to avoid any confusion regarding the application of Policy EMP3, we believe it should be re-named 'PROTECTION OF ALLOCATED AND EXISTING EMPLOYMENT SITES AND PREMISES'.

Finally, given the Welsh Government's objectives for the site to cater for general employment demands (including specialised/niche employers, operators requiring air-side facilities and inward investors seeking a very large single site opportunity), we consider the policy should refer to “Bro Tathan Business Park” rather than “Bro Tathan Aerospace and Business Park”.

Full text:

We write to comment and seek amendments to Policy EMP3 'PROTECTION OF EXISTING EMPLOYMENT SITES AND PREMISES'.

We note that while the the title of Policy EMP3 refers to 'existing employment sites and premises', it is clear form the text of the policy that it also applies to 'Major Employment Sites'. The Proposals Map identifies 'existing employment' and 'major employment' sites separately and with different boundaries, such that 'major employment' sites includes land which is not an existing employment location (eg land at Bro Tathan North as well as land at Cardiff Airport).

In order to avoid any confusion regarding the application of Policy EMP3, we believe it should be re-named 'PROTECTION OF ALLOCATED AND EXISTING EMPLOYMENT SITES AND PREMISES'.

Finally, given the Welsh Government's objectives for the site to cater for general employment demands (including specialised/niche employers, operators requiring air-side facilities and inward investors seeking a very large single site opportunity), we consider the policy should refer to “Bro Tathan Business Park” rather than “Bro Tathan Aerospace and Business Park”.

Change suggested by respondent:

-

Sound: Not specified
Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/spr

5258 Support

Document Element: Bro Tathan Aerospace
Respondent: Llantwit Major Town Council (Clerk) [230]

Summary:

We also note that Site ID 424 sits partially within the Llantwit Major boundary and is appropriate for employment

Full text:

Llantwit Major Town Council considers that the five areas identified for the development of Llantwit Major and its immediate localities are appropriate for the future development of the town. The allocation of an area between the Northern Access road and the Eglwys Brewis Road as a major land bank enables future housing developments but we question whether the infrastructure will be appropriate. The land at the former Eagleswell School site should be reserved for health and social care facilities. We note the land between Llantwit Major and Llanmaes should serve as a green wedge and the provision of retail floorspace, both of which are appropriate. We also note that Site ID 424 sits partially within the Llantwit Major boundary and is appropriate for employment

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

5709 Object

Document Element: The Chemical Complex, Barry

Respondent: Mr David Entwistle [3264]

Summary:

This site is very large and I think it unrealistic to expect the whole site to be filled in the future by business usage. Some of this site could be put forward as a housing development site to avoid housing developments being built on Greenfield land.

Full text:

This site is very large and I think it unrealistic to expect the whole site to be filled in the future by business usage. Some of this site could be put forward as a housing development site to avoid housing developments being built on Greenfield land.

Change suggested by respondent:

I think protecting this site purely for business use is unrealistic and not the most efficient use of brownfield sites. It is a large site and rather than potentially sitting empty for years to come should be put forward as a brownfield site for potential housing development alleviating more pressing housing problems.

Sound: No

Attachments: None

5916 Object

Document Element: Cardiff Airport Business

Respondent: Emma Reed [2653]

Summary:

Development of the readers way site could curtail the development of the airport as there will be more houses to object to operations on the airport site due to noise and no control over BAMC opening their doors and testing engines. Likely increased flooding too from the airport runways,

Full text:

Development at Readers Way will likely be affected from flooding and airport noise already occurring in the Rhoose area. Development of the readers way site could curtail the development of the airport as there will be more houses to object to operations on the airport site due to noise and no control over BAMC opening their doors and testing engines. Likely increased flooding too from the airport runways,

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6236 Support

Document Element: Operational Port, Barry

Respondent: Associated British Ports (Mr Will Ryan, Land & Planning Manager) [2477]

Summary:

ABP fully supports this policy and looks forward to working constructively alongside VoGC and other key stakeholders to realise the opportunities that the Port of Barry can deliver for the town, the Vale of Glamorgan and the Wales economies.

Full text:

ABP fully supports this policy and looks forward to working constructively alongside VoGC and other key stakeholders to realise the opportunities that the Port of Barry can deliver for the town, the Vale of Glamorgan and the Wales economies.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6566 Support

Document Element: Renishaw, Junction 34, M4

Respondent: Renishaw Plc [1277]

Agent: Turley

Summary:

Renishaw Plc support the continued allocation of the current Renishaw premises as an existing Major Employment Site under Policy EMP3.6 – Renishaw, Junction 34, M4.

The allocation of the Renishaw site recognises the importance of the established employment site for the local economy. Renishaw continue to represent an important local employer, who provide high quality, skilled and specialist employment opportunities for the local population.

The continued safeguarding of the site for B1, B2 and B8 uses is therefore supported.

Full text:

We write on behalf of our client, Renishaw Plc, in response to the current consultation on the Vale of Glamorgan Replacement Local Development Plan (RLDP). We write to provide our comments in relation to the Vale of Glamorgan Deposit RLDP.

This letter is accompanied by the following:
• Completed Public Consultation Representation Form.

Renishaw's comments on the Deposit RLDP policies and allocations are outlined below.

BACKGROUND

Established in 1973, Renishaw is a global leader in measurement, motion control, spectroscopy, and precision machining. The company is renowned for pioneering innovative solutions designed to enhance operational performance – optimising manufacturing efficiencies, improving product quality, advancing research capabilities, and increasing the effectiveness of medical procedures.

As part of a major redevelopment of its Miskin site in South Wales, Renishaw is investing over £50 million to expand its manufacturing capacity and reinforce its commitment to achieving net zero carbon emissions. This investment includes the construction of two new low-carbon production halls, which are designed to meet the growing domestic and international demand for its products, while also supporting research and development initiatives.

Policy SP14 – Employment Growth

Renishaw Plc supports the retention of Land to the South of Junction 34 of the M4, Hensol (36.23ha net) as a Major Employment Allocation under Policy SP14.4. The allocation of the site is crucial to ensure that the Council can meet its projected employment land needs and deliver the anticipated level of sustainable employment growth over the Plan period.

The site's continued allocation as a major employment site reflects it's importance as a key opportunity for investment and employment opportunities within the Vale of Glamorgan. The site is of strategic and regional importance as an employment site in a market where high quality, well connected industrial sites are rare.

Outline planning permission was originally granted for the proposed site (Ref no. 2014/00228/EAO) on 22 June 2016.

This permission has subsequently been renewed via a S73 application (ref: 2021/00899/EAO) which extends the period of time for the submission of reserved matters for a further 5 years from the date of the new permission (to 22 December 2030). The permission provides for the following development:

"Outline planning permission with all matters reserved except for access, for development comprising class B1, B2 and B8 uses; a hotel/residential training centre (class C1/C2); and ancillary uses within class A1, A2, A3; associated engineering and ground modelling works and infrastructure, car parking, drainage and access for all uses; provision of infrastructure (including energy centre(s)); landscaping and all ancillary enabling works) at Renishaw Plc, Miskin Business Park, Miskin."

A summary of the key elements of the outline permission are:
• Up to 151,060.99sqm of industrial floor space comprising Class B1, B2, B8 uses;
• Up to 9,290.30sqm of Hotel/Residential Training Centre (Class C1/C2);
• Up to 1,300sqm of ancillary Class A1, A2 and A3 uses;
• Up to 3,200 car parking spaces;
• 30.51ha of Green Infrastructure, comprising landscaping, water balancing areas;
• Access and servicing arrangements; and,
• Ancillary services, including power/utilities (with potential to incorporate energy centre (s)).

Reserved matters permission (reference number: 2019/01421/RES) was approved on 20 May 2021 to bring forward the first phase of the development. This phase of the development is now complete and provides 400,000 sqft of floorspace which is occupied by Renishaw as an extension to its existing operations at Miskin. In addition to employment opportunities created over the construction period, the development has created additional operational jobs for Renishaw. Significantly, many of these jobs provide high quality employment opportunities in the skilled and specialist

sector, helping to create skills and provide local employment opportunities.

Renishaw will shortly bring its wider land holdings to the market with the intention of attracting major employment generating uses - further enhancing the economy of the region. The remaining phases of the site (Areas B, C and D) provide further opportunity for inward investment over the Plan period and the creation of over 1,000,000 square feet of employment space.

It is anticipated that Areas B, C and D could have the potential to create over 2,000 operational jobs. During the construction phase, the development also has the potential to create over 1,000 jobs further adding to the employment opportunities created through the development.

The recent renewal of the outline planning permission ensures that the development of the site remains deliverable over the Plan period.

EMP3 - Protection of Existing Employment Sites and Premises

Renishaw Plc support the continued allocation of the current Renishaw premises as an existing Major Employment Site under Polic EMP3.6 – Renishaw, Junction 34, M4.

The allocation of the Renishaw site recognises the importance of the established employment site for the local economy. Renishaw continue to represent an important local employer, who provide high quality, skilled and specialist employment opportunities for the local population.

The continued safeguarding of the site for B1, B2 and B8 uses is therefore supported.

EMP4 – Non-Employment Proposals on Existing Employment Areas and Premises

General support is given to Policy EMP4 which seeks to restrict the development of non-B1, B2 and B8 uses to ancillary services and facilities associated with an existing or proposed employment use.

However, the Policy should provide greater flexibility to allow for appropriate employment generating proposals which complement the existing uses and which may not clearly fall within the B1, B2 and B8 use class. This flexibility is essential in order to allow the sites to respond to changing market demand and emerging markets.

Summary

We trust that the above representations assist and are taken into account as the preparation of the Plan progresses.

We would be grateful if we could be kept informed of future stages of the emerging RLDP.

If you require any further information, please do not hesitate to contact me.

Yours sincerely

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - https://valeofglamorgan.oc2.uk/a/3sh
Supporting Evidence - https://valeofglamorgan.oc2.uk/a/3td

6670 Comment

Document Element: Atlantic Trading Estate, Barry

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to

coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of "areas of high ecological value" will also go some way towards resolving the points we raise.
Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.
Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.
This will ensure that development in the area:

• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of 'High Ecological Value' (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in

order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure
Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological
connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to ‘6 broad habitat types’ including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to ‘6 broad ecosystems’ to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP’s Strategic Sites, as set out in our response ref: CAS-234819-

C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan

Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it “is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary”.
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW’s Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of ‘Policy DNP8 – Severn Estuary Recreational
Pressure’ within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate

Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

7181 Object

Document Element: EMP3 - PROTECTION OF EXISTING EMPLOYMENT SITES AND PREMISES
Respondent: Cadoc Castle Land Developments LTD [2261]
Agent: Geraint John Planning Ltd

Summary:

In light of the candidate site submission made by the site promoter, it is considered that the site should be considered acceptable and appropriate as an employment site allocation.
It is considered that the site should be re-allocated as an employment site, given that the previous concerns regarding deliverability have been overcome (as evidenced in the candidate site submission). As a result, it is considered that the site should be identified within the Policy EMP3.
It is considered that the Plan has failed to follow the evidence base that has been undertaken for the Plan preparation process – given that the settlement boundary has not been redrawn around the site in accordance with the recommendations of the Employment Supplementary Paper (2025). This is contrary to the provisions of the Development Plans Manual. Accordingly, notwithstanding the proposed re-allocation of the site, in any event, it should be the case that the site is included within the settlement boundary, which would then follow the recommendations of the evidence base which should inform the Deposit Plan.

Full text:

Representations regarding the Deposit Plan Consultation – 'Land off Millennium Way'

Please find enclosed, on behalf of and under instruction from our client, 'Cadoc Castle Land Developments Ltd, representations for consideration as part of Vale of Glamorgan's RLDP Deposit Plan.

Context to these Representations

The above site has been submitted as a Candidate Site as part of the Deposit Plan consultation. The following has been submitted as part of this process:

• Candidate Site Submission (including Sustainability Appraisal and Assessment against Candidate Site Methodology);
• Development Viability Model (dated March 2026) completed by Cooke & Arkwright.

Having regard to the above information submitted, and in summary, it is considered that the site should be considered acceptable and appropriate as an employment site allocation, in light of the following conclusions drawn:

• The Sustainability Appraisal completed for the site confirms that the site has a range of positive impacts through its allocation for employment uses, and could assist in achieving the Plan's Sustainability objectives.
• In respect of assessing the site against the Candidate Site Methodology, the site is considered available for development and has a viable prosect of coming forward in the short term, for delivering further employment land in the plan period.
• The site is in an inherent sustainable location with excellent access to key services and facilities, and public transport.
• The development of the site would bring about significant employment opportunities in a range of different sectors.
• The site has limited constraints, given that it is currently brownfield land and doesn't include any high grade agricultural land.
• The redevelopment of the site has the ability to make a positive contribution to placemaking and wellbeing.
• The site has been considered acceptable as an allocation previously by the Council in their assessment of the previously proposed uses (residential and mixed-use) – it is only the covenant that prohibited the residential development of the site.

We consider that the site 'performs' well against the defined assessment criteria and methodology, with no evident insurmountable constraints, obstacles, or failings. It has been demonstrated above that there are no insurmountable constraints to development of the site, which includes the covenant that was previously a key constraint to the delivery of the previously proposed development. The latest proposals overcome this, which in turn, evidences that the re-allocation of the site is deliverable, and in turn, sound. As such, the site should be considered a 'reasonable' option, and should progress to the Stage 3 assessment accordingly.

Given that the site is not currently allocated in the Deposit Plan, we would raise an objection to the Plan in its current form, on the basis of the Candidate Site submission. Further details are included below.

Summary of these Deposit Representations

In light of the Candidate Site Submission made by the site promoter, we would suggest that the site should form an employment allocation within the RLDP. As a result, the site promoter looks to raise an objection to the Deposit Plan. Para 5.7 stats that the RLDP will make provision for "An allocation of 182 Ha of employment land across a range of sites to enable 67.8 Ha to be brought forward during the plan period and the delivery of up to 5,338 jobs". It is noted that there are currently a total of 8 sites highlighted as employment allocations in Policy SP14 'Employment Growth'. Policy EM1 also highlights two 'Employment Regeneration Opportunity Areas'.

Although there is no objection raised to the inclusion of the sites already identified within the policy in principle, it is considered that the site should be re-allocated as an employment site, given that the previous concerns regarding deliverability have been overcome (as evidenced in the candidate site submission). As a result, it is considered that the site should be identified within the Policy EMP3.

We also object to the Council's omission of the site within the settlement boundary of Barry, given that the Employment Supplementary Paper (2025) outlined the following recommendation in respect of the site:

"The site has not been allocated but has been retained as white land within the settlement, offering an opportunity for it to be redevelopment for employment should this be deliverable in the future."

Accordingly, the evidence base undertaken to inform the preparation of the Plan recognises the development potential of the site, and outlines that by retaining the site as white land within the settlement, this allows for an opportunity for the site to be developed for employment purposes in the Plan period.

That said, the Deposit Plan Proposals Map shows the site to be located outside of the settlement boundary. As set out in the Development Plans Manual (2020), the policies and allocations in the LDP should flow from the evidence, rather than it being collected retrospectively.

It is therefore the case that we object to the Plan in its current form, as it has failed to follow the recommendations set out in its evidence base, contrary to the provisions of the Development Plans Manual set out above.

The fundamental requirement for a Local Development Plan (LDP) is to be sound, and the Development Plans Manual sets out the statutory and procedural requirements for LDP preparation and the three tests of soundness.

Test 2 relates to whether the plan is appropriate (i.e. is the plan appropriate for the area in light of the evidence). A sub-question to this test is whether the plan is supported by robust, proportionate and credible evidence.

It is considered that the Plan has failed to follow the evidence base that has been undertaken for the Plan preparation

process – given that the settlement boundary has not been redrawn around the site in accordance with the recommendations of the Employment Supplementary Paper (2025). The formulation of a Deposit Plan must be underpinned by the evidence base, which includes the settlement boundary.

Accordingly, notwithstanding the proposed re-allocation of the site, in any event, it should be the case that the site is included within the settlement boundary, which would then follow the recommendations of the evidence base which should inform the Deposit Plan.

Conclusion

These representations raise objection to the Deposit Plan – for the reasons set out above.

Given the nature of these representations our clients would be happy to discuss any aspect of the submission made and credentials of the site when your Authority comes to evaluate matters.

We look forward to hearing from you in due course. In the meantime, however, we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3ms
Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3m3

7242 Object

Document Element: EMP3 - PROTECTION OF EXISTING EMPLOYMENT SITES AND PREMISES
Respondent: Woodwise Ltd (Mr & Mrs S & K Williams) [3772]
Agent: Geraint John Planning Ltd

Summary:

Although there is no objection raised to the inclusion of the sites already identified within the policy in principle, it is considered that Crossways Estate site should be considered as both an existing employment site, which is located near to a sustainable settlement, but also has the ability to provide a larger area for employment, which would help to make the existing business more viable. As a result, it is considered that the site should be identified within the Policy EMP3.

Policy EMP3 'Protection of Existing Employment Sites and Premises' provides a policy which looks to safeguard existing employment allocations within the Vale. The policy states: "The following hierarchy of existing employment sites are safeguarded for B1, B2 and B8 employment uses, and will be protected from development which would compromise their role and function". These are split into Major Employment Sites, Secondary Employment Sites and Key Local Employment Sites. Although Para 6.290 highlights that "Other Premises in Employment Use" are also a type of employment site which has a role and function in the Vale. However, there are a range of smaller and more rural existing employment sites which are not identified or referenced within the policy. We consider that the policy does not go far enough to protect other more rural existing employment sites, such as Crossways Estate.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP)

Representations regarding the Deposit Plan Consultation – 'Crossways Estate, Cowbridge'

Please find enclosed, on behalf of and under instruction from our client, 'Woodwise Limited', representations for consideration as part of Vale of Glamorgan's RLDP Deposit Plan.

Context to these Representations

The above site has been submitted as a Candidate Site as part of the Deposit Plan consultation. The following has been submitted as part of this process:

- Candidate Site Submission (including Sustainability Appraisal and Assessment against Candidate Site Methodology);
- Site Location Plan (dwg ref. A101);
- Illustrative Site Layout plan (dwg ref. A112);
- Development Viability Model (dated March 2026) completed by HRT.

Having regard to the above information submitted, and in summary, it is considered that the site should be considered acceptable and appropriate as an employment site allocation, in light of the following conclusions drawn:

- The Sustainability Appraisal completed for the site confirms that the site has a range of positive impacts through its allocation for employment uses, and could assist in achieving the Plan's Sustainability objectives.
- In respect of assessing the site against the Candidate Site Methodology, the site is considered available for development and has a viable prospect of coming forward in the short term, for delivering further employment land in the plan period.
- The site has limited constraints, given that it is currently partially brownfield land and doesn't include any high grade agricultural land.
- The only policy destination for the site to overcome would be in relation to the SLA, which could be addressed through a Landscape and Visual Impact Assessment submitted as part of any future application.
- The site is located in the countryside but is brownfield and already a well-established existing business which has been running as an employment site for many years. It is considered that the redevelopment of this site presents an opportunity to develop the site for further uses, in order to realise the sites full potential.
- The site already benefits from existing connections to infrastructure such as water, electricity, gas and the local highway.
- The redevelopment of the site has the ability to make a positive contribution to placemaking and wellbeing.

We consider that the site 'performs' well against the defined assessment criteria and methodology, with no evident insurmountable constraints, obstacles, or failings. It has been demonstrated above that there are no insurmountable constraints to development of the site, which would represent an appropriate existing employment site allocation, with the ability to extend this further. Moreover, the site comprises previously developed land and benefits from existing permissions for its current use. As such, the site should be considered a 'reasonable' option, and should progress to the Stage 3 assessment accordingly.

Given that the site is not currently allocated in the Deposit Plan, we would raise an objection to the Plan in its current form, on the basis of the Candidate Site submission. Further details are included below.

Summary of these Deposit Representations – Employment Sites

In light of the Candidate Site Submission made by the site promotor, we would suggest that the site should form an employment allocation within the RLDP. As a result, the site promoter looks to raise an objection to the Deposit Plan.

Para 5.7 stats that the RLDP will make provision for "An allocation of 182 Ha of employment land across a range of sites to enable 67.8 Ha to be brought forward during the plan period and the delivery of up to 5,338 jobs". It is noted that there are currently a total of 8 sites highlighted as employment allocations in Policy SP14 'Employment Growth'. Policy EM1 also highlights two 'Employment Regeneration Opportunity Areas'.

Although there is no objection raised to the inclusion of the sites already identified within the policy in principle, it is considered that Crossways Estate site should be considered as both an existing employment site, which is located near to a sustainable settlement, but also has the ability to provide a larger area for employment, which would help to make the existing business more viable. As a result, it is considered that the site should be identified within the Policy EMP3.

Policy EMP3 'Protection of Existing Employment Sites and Premises' provides a policy which looks to safeguard existing employment allocations within the Vale. The policy states: "The following hierarchy of existing employment sites are safeguarded for B1, B2 and B8 employment uses, and will be protected from development which would compromise their role and function". These are split into Major Employment Sites, Secondary Employment Sites and Key Local Employment Sites. Although Para 6.290 highlights that "Other Premises in Employment Use" are also a type of employment site which has a role and function in the Vale. However, there are a range of smaller and more rural existing employment sites which are not identified or referenced within the policy. We consider that the policy does not go far enough to protect other more rural existing employment sites, such as Crossways Estate.

Policy EMP6 'New Rural Diversification and Employment Uses in the Countryside' provides policy mechanism to support rural employment and diversification in the Vale. However, we consider that the policy does not go far enough to protect and enhance existing employment sites or, provide for opportunities to extend smaller businesses. We would therefore suggest that the following wording is added into Policy EMP6 outlined below in red:

"Proposals for new rural diversification, including tourism facilities, and B1, B2 and B8 employment uses within the countryside outside of defined settlement boundaries or employment areas identified in Policy EMP3 may be appropriate where the proposal is for:

- The re-use or adaptation of existing commercial premises or an existing rural buildings in association with a rural enterprise or farm diversification scheme;
- Small scale new building employment premises that are well related to a rural settlement, or lie within or immediately adjacent to an existing farm building complex;
- Employment uses where a countryside location is essential for the operational requirements that cannot be met on an existing employment area;
- Sustainable low impact tourism and leisure proposals.
- Small-scale extensions to existing employment sites"

It is considered that the employment strategy for the RLDP should go further to support the delivery of smaller employment sites, which would have the effect of a more balanced and equitable distribution of employment sites apportioned across the entire Plan area – including further sites around Cowbridge. The Employment Land Study (2023) highlights that there is a strong demand for B1, B2 and B8 premises within the rural Vale beyond the traditional rural enterprise and diversification of existing agricultural businesses. The proposed changes to Policy EMP6 would provide further support for existing businesses to redevelop or expand, creating better opportunities on existing sites, where there are limited impacts of redevelopment and expansion. Equally, additional employment allocations should be identified to ensure that the overall need is met over the Plan period. Failure to make the necessary changes to the Plan would bring into question the deliverability of the Plan, and by association, its “soundness”.

Conclusion

These representations raise objection to the Deposit Plan – for the reasons set out above.

Given the nature of these representations our clients would be happy to discuss any aspect of the submission made and credentials of the site when your Authority comes to evaluate matters.

We look forward to hearing from you in due course. In the meantime, however, we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Yours sincerely

Change suggested by respondent:

The Crossways Estate, Cowbridge site should be identified within the Policy EMP3

Sound: No

Attachments:

Representation Form - https://valeofglamorgan.oc2.uk/a/436
Cover Letter - https://valeofglamorgan.oc2.uk/a/437
Candidate Site Assessment - Redacted - https://valeofglamorgan.oc2.uk/a/43v
Location Plan - Redacted - https://valeofglamorgan.oc2.uk/a/43c
Block Plan - Redacted - https://valeofglamorgan.oc2.uk/a/43w

4692 Object

Document Element: EMP4 - NON-EMPLOYMENT PROPOSALS ON EXISTING EMPLOYMENT AREAS AND PREMISES

Respondent: Amstone Developments Limited [3758]

Agent: Tetra Tech Cardiff

Summary:

Policy EMP4
Clarify the definition of “non-employment proposals” so that non-B1/B2/B8 uses capable of generating employment are properly treated as “employment uses”. Remove -duplicated criteria already controlled via other policies

Modification- Supporting Text
Update the supporting text to acknowledge that employment allocations within the Enterprise Zone should support a flexible mix of economic uses reflecting the national policy position in PPW, TAN 23 and Future Wales

Full text:

These representations relate to ‘Land at Tredogan Road, Rhoose, Barry’ (the Site), owned by Amstone Developments Ltd (ADL).

Amstone Developments Limited (ADL) support the draft RLDP allocation of the Site within the ‘Major Employment Allocation – Land East of Cardiff Airport, Roose’

Requested Modifications
Policy SP14
Amend Policy SP14 and its supporting text to confirm that the Major Employment Allocation at Land East of Cardiff Airport may accommodate a broad range of employment-generating uses, consistent with the definition of economic development in PPW and TAN 23, and not restricted solely to B1, B2 or B8 uses

Policy EMP4
Clarify the definition of “non-employment proposals” so that non-B1/B2/B8 uses capable of generating employment are properly treated as “employment uses”. Remove -duplicated criteria already controlled via other policies

Modification- Supporting Text
Update the supporting text to acknowledge that employment allocations within the Enterprise Zone should support a flexible mix of economic uses reflecting the national policy position in PPW, TAN 23 and Future Wales

The evidence and policy context clearly support the continued allocation of the Site for employment, enterprise and commercial use. This is consistent with the Council’s own SPG and emerging LDP policies which aim to de-risk the under-delivery of employment land and job creation and enhance the Site’s potential to attract inward investment and high-value economic activity.

Amstone Developments Limited fully support that the RLDP allocates the Site for general employment use (B1, B2, and B8) with flexibility to accommodate complementary economic development, consistent with national guidance, the Use Classes Order (Wales), and market evidence

Change suggested by respondent:

Policy EMP4
Clarify the definition of “non-employment proposals” so that non-B1/B2/B8 uses capable of generating employment are properly treated as “employment uses”. Remove -duplicated criteria already controlled via other policies

Modification- Supporting Text
Update the supporting text to acknowledge that employment allocations within the Enterprise Zone should support a flexible mix of economic uses reflecting the national policy position in PPW, TAN 23 and Future Wales

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/swx

5192 Comment

Document Element: EMP4 - NON-EMPLOYMENT PROPOSALS ON EXISTING EMPLOYMENT AREAS AND PREMISES
Respondent: Welsh Government (Economy, Treasury and Constitution Group - Property Infrastructure) [1213]
Agent: CarneySweeney

Summary:

We write to comment and seek amendments to Policy EMP4 'NON-EMPLOYMENT PROPOSALS ON EXISTING EMPLOYMENT AREAS AND PREMISES'

We note that while the the title of Policy EMP4 refers to 'existing employment areas and premises', it is clear form the text of the policy that it also applies to 'Major Employment Sites'. The Proposals Map identifies 'existing employment' and 'major employment' sites separately and with different boundaries, such that 'major employment' sites includes land which is not an existing employment location (eg land at Bro Tathan North as well as land at Cardiff Airport).

In order to avoid any confusion regarding the application of Policy EMP3, we believe it should be re-named 'NON-EMPLOYMENT PROPOSALS ON ALLOCATED AND EXISTING EMPLOYMENT AREAS AND PREMISES'.

Furthermore, the opening paragraph of text to Policy EMP4 cross refers to Policy EMP2: 'Development proposals on existing employment sites and premises identified in Policy EMP2 will be subject to the following restrictions:...' Policy EMP2 relates to MOD St Athan. We believe this cross reference should be to Policy EMP3.

Full text:

We write to comment and seek amendments to Policy EMP4 'NON-EMPLOYMENT PROPOSALS ON EXISTING EMPLOYMENT AREAS AND PREMISES'

We note that while the the title of Policy EMP4 refers to 'existing employment areas and premises', it is clear form the text of the policy that it also applies to 'Major Employment Sites'. The Proposals Map identifies 'existing employment' and 'major employment' sites separately and with different boundaries, such that 'major employment' sites includes land which is not an existing employment location (eg land at Bro Tathan North as well as land at Cardiff Airport).

In order to avoid any confusion regarding the application of Policy EMP3, we believe it should be re-named 'NON-EMPLOYMENT PROPOSALS ON ALLOCATED AND EXISTING EMPLOYMENT AREAS AND PREMISES'.

Furthermore, the opening paragraph of text to Policy EMP4 cross refers to Policy EMP2: 'Development proposals on existing employment sites and premises identified in Policy EMP2 will be subject to the following restrictions:...' Policy EMP2 relates to MOD St Athan. We believe this cross reference should be to Policy EMP3.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form Redacted - https://valeofglamorgan.oc2.uk/a/spt

6239 Object

Document Element: EMP4 - NON-EMPLOYMENT PROPOSALS ON EXISTING EMPLOYMENT AREAS AND PREMISES
Respondent: Associated British Ports (Mr Will Ryan, Land & Planning Manager) [2477]

Summary:

ABP objects to this policy. It is overly restrictive in respect of the Use Classes set out (B1, B2 and B8).

With regards to Port land, and other employment land, many of the proposed and promoted uses within the RLDP are associated with a suis generis use, including renewable energy and sustainable development opportunities. These do not necessarily fit neatly into the stated use classes, and the text of this policy, as drafted, suggests that those uses would not be compliant. This is an unintended consequence of an effort to limit other types of uses within employment land (eg. retail).

Full text:

ABP objects to this policy. It is overly restrictive in respect of the Use Classes set out (B1, B2 and B8).

With regards to Port land, and other employment land, many of the proposed and promoted uses within the RLDP are associated with a suis generis use, including renewable energy and sustainable development opportunities. These do not necessarily fit neatly into the stated use classes, and the text of this policy, as drafted, suggests that those uses would not be compliant. This is an unintended consequence of an effort to limit other types of uses within employment land (eg. retail).

Change suggested by respondent:

It is suggested that the text is amended as suggested:

Non B1, B2 and B8 and suis generis uses will be restricted to ancillary services or facilities associated with an existing or proposed employment use that would serve employees on the wider employment site where:

Sound: Yes
Attachments: None

6565 Comment

Document Element: EMP4 - NON-EMPLOYMENT PROPOSALS ON EXISTING EMPLOYMENT AREAS AND PREMISES
Respondent: Renishaw Plc [1277]
Agent: Turley

Summary:

General support is given to Policy EMP4 which seeks to restrict the development of non-B1, B2 and B8 uses to ancillary services and facilities associated with an existing or proposed employment use.

However, the Policy should provide greater flexibility to allow for appropriate employment generating proposals which complement the existing uses and which may not clearly fall within the B1, B2 and B8 use class. This flexibility is essential in order to allow the sites to respond to changing market demand and emerging markets.

Full text:

We write on behalf of our client, Renishaw Plc, in response to the current consultation on the Vale of Glamorgan Replacement Local Development Plan (RLDP). We write to provide our comments in relation to the Vale of Glamorgan Deposit RLDP.

This letter is accompanied by the following:
• Completed Public Consultation Representation Form.

Renishaw's comments on the Deposit RLDP policies and allocations are outlined below.

BACKGROUND

Established in 1973, Renishaw is a global leader in measurement, motion control, spectroscopy, and precision machining. The company is renowned for pioneering innovative solutions designed to enhance operational performance – optimising manufacturing efficiencies, improving product quality, advancing research capabilities, and increasing the effectiveness of medical procedures.

As part of a major redevelopment of its Miskin site in South Wales, Renishaw is investing over £50 million to expand its manufacturing capacity and reinforce its commitment to achieving net zero carbon emissions. This investment includes the construction of two new low-carbon production halls, which are designed to meet the growing domestic and international demand for its products, while also supporting research and development initiatives.

Policy SP14 – Employment Growth

Renishaw Plc supports the retention of Land to the South of Junction 34 of the M4, Hensol (36.23ha net) as a Major Employment Allocation under Policy SP14.4. The allocation of the site is crucial to ensure that the Council can meet its projected employment land needs and deliver the anticipated level of sustainable employment growth over the Plan period.

The site's continued allocation as a major employment site reflects it's importance as a key opportunity for investment and employment opportunities within the Vale of Glamorgan. The site is of strategic and regional importance as an employment site in a market where high quality, well connected industrial sites are rare.

Outline planning permission was originally granted for the proposed site (Ref no. 2014/00228/EAO) on 22 June 2016.

This permission has subsequently been renewed via a S73 application (ref: 2021/00899/EAO) which extends the period of time for the submission of reserved matters for a further 5 years from the date of the new permission (to 22 December 2030). The permission provides for the following development:

"Outline planning permission with all matters reserved except for access, for development comprising class B1, B2 and B8 uses; a hotel/residential training centre (class C1/C2); and ancillary uses within class A1, A2, A3; associated engineering and ground modelling works and infrastructure, car parking, drainage and access for all uses; provision of infrastructure (including energy centre(s)); landscaping and all ancillary enabling works) at Renishaw Plc, Miskin Business Park, Miskin."

A summary of the key elements of the outline permission are:
• Up to 151,060.99sqm of industrial floor space comprising Class B1, B2, B8 uses;
• Up to 9,290.30sqm of Hotel/Residential Training Centre (Class C1/C2);
• Up to 1,300sqm of ancillary Class A1, A2 and A3 uses;
• Up to 3,200 car parking spaces;
• 30.51ha of Green Infrastructure, comprising landscaping, water balancing areas;
• Access and servicing arrangements; and,
• Ancillary services, including power/utilities (with potential to incorporate energy centre (s)).

Reserved matters permission (reference number: 2019/01421/RES) was approved on 20 May 2021 to bring forward the first phase of the development. This phase of the development is now complete and provides 400,000 sqft of floorspace which is occupied by Renishaw as an extension to its existing operations at Miskin. In addition to employment opportunities created over the construction period, the development has created additional operational jobs for Renishaw. Significantly, many of these jobs provide high quality employment opportunities in the skilled and specialist sector, helping to create skills and provide local employment opportunities.

Renishaw will shortly bring its wider land holdings to the market with the intention of attracting major employment generating uses - further enhancing the economy of the region. The remaining phases of the site (Areas B, C and D) provide further opportunity for inward investment over the Plan period and the creation of over 1,000,000 square feet of employment space.

It is anticipated that Areas B, C and D could have the potential to create over 2,000 operational jobs. During the construction phase, the development also has the potential to create over 1,000 jobs further adding to the employment opportunities created through the development.

The recent renewal of the outline planning permission ensures that the development of the site remains deliverable over the Plan period.

EMP3 - Protection of Existing Employment Sites and Premises

Renishaw Plc support the continued allocation of the current Renishaw premises as an existing Major Employment Site under Polic EMP3.6 – Renishaw, Junction 34, M4.

The allocation of the Renishaw site recognises the importance of the established employment site for the local economy. Renishaw continue to represent an important local employer, who provide high quality, skilled and specialist employment opportunities for the local population.

The continued safeguarding of the site for B1, B2 and B8 uses is therefore supported.

EMP4 – Non-Employment Proposals on Existing Employment Areas and Premises

General support is given to Policy EMP4 which seeks to restrict the development of non-B1, B2 and B8 uses to ancillary services and facilities associated with an existing or proposed employment use.

However, the Policy should provide greater flexibility to allow for appropriate employment generating proposals which complement the existing uses and which may not clearly fall within the B1, B2 and B8 use class. This flexibility is essential in order to allow the sites to respond to changing market demand and emerging markets.

Summary

We trust that the above representations assist and are taken into account as the preparation of the Plan progresses.

We would be grateful if we could be kept informed of future stages of the emerging RLDP.

If you require any further information, please do not hesitate to contact me.

Yours sincerely

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - https://valeofglamorgan.oc2.uk/a/3sh
Supporting Evidence - https://valeofglamorgan.oc2.uk/a/3td

6154 Object

Document Element: EMP6 - NEW RURAL DIVERSIFICATION AND EMPLOYMENT USES IN THE COUNTRYSIDE

Respondent: Ms Lucie Taylor [2506]

Summary:

SF&G welcome the Council's recognition of supporting a vibrant countryside, including local employment, farming, and rural businesses, as outlined in policy EMP3. We suggest emphasising the importance of Wales' self-sufficiency through land-based food production in Wales. Policies SP5 and EMP6 should promote farm diversification aligned with the Sustainable Farming Scheme, encouraging smaller-scale farms that produce high food and employment yields. Given the decline in UK sheep farming, horticulture should be acknowledged as a significant rural employer, with diversification and innovative farming methods central to this policy.

Full text:

We are pleased to see the Council recognises the importance of supporting a vibrant living countryside in policy EMP3 - development in the countryside , providing for local employment, supporting farming and rural businesses, enabling the provision of affordable housing to meet local needs and accommodating uses that cannot be located within a defined settlement. We would like to see more reference to the need to feed ourselves from the land we have here in Wales. Policy SP5 subsequent text and Policy EMP6 should encourage farm diversification proposals that are in line with the Sustainable Farming Scheme (there will be lots of diversification away from the traditional ways of farming and the SFS encourages this) and supports farmers to farm in a way that allows nature and biodiversity to thrive. Smaller scale farming units will become more common place and the scepticism around these businesses needs to diminish because they produce a lot more food and employment per sq. metre than what, might be considered traditional/ successful, forms of farming in Wales. This article demonstrates how sheep farming is declining in the UK.
https://www.bbc.co.uk/news/articles/cgrzd72wp5zo
Therefore, the potential of horticulture to be a big employer of people in the countryside should be acknowledged under Policy EMP6. It is not just about 'B' uses in the countryside. Farm diversification and less traditional methods of farming will employ many people over the plan period and these uses should form a centre piece of this policy.

Change suggested by respondent:

Reference to horticulture and farm diversification employment is needed.

Sound: No

Attachments: None

6724 Comment

Document Element: EMP6 - NEW RURAL DIVERSIFICATION AND EMPLOYMENT USES IN THE COUNTRYSIDE

Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply
chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable
agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models. Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses.

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning
guidance (SPG) proposed. We are keen to ensure that these SPG's are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are
involved in the development of some of these. The content and application of the SPG's will be fundamental to the effectiveness of several of the policies identified in the
deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community
amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: "The Local Development Plan will support resilient and sustainable local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part of sustainable growth."

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

"Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other opportunities for local food production as part of multifunctional green infrastructure."

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

6.54 We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live full, productive and prosperous lives.'

6.60 We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to ensure Developers submit a quality HIA and implement the conclusions.

6.61 Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

6.62 Wales Health Impact Assessment Support Unit has recently released guidance on HIA - see https://phwwhocc.co.uk/whiasu/ for more information and toolkits to ensure most up to date is in use.

6.63 Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the community..'.

6.65 Suggestion to change wording from 'encouraged' to 'expected' for example: Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement for HIA will assist with this expectation.

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference "enhancements to leisure, sport and recreation spaces". Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation. It is recommended that the Key Site schedules include minimum on-site provision standards and delivery phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population growth.

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail
centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer
supply chains. This limits opportunities for strengthening local food economies.
It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for 'local affordable food' outlined in SP5.

Consider adding: "The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach."

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to
consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and
Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: "Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food
infrastructure within walking distance of new residential areas." This addresses diet related health inequalities, encourages healthier communities and aligns with HIA
guidance.

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply
chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable
agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models.

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses - to include the following wording: "Rural diversification proposals that support agro-ecological farming, sustainable local food production,
community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations."

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel
Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022
01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing
flooding and making use more comfortable during hot weather (such as shading from trees). We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

SP13 Community infrastructure and planning obligations:

We want to take this opportunity to highlight the challenges that population growth places on healthcare
services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure. Please refer to the information provided as part of the background evidence paper titled 'BP37
Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within
existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new
developments to take forward its strategic objectives.

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space Assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres. Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.”
There is no reference to the expectation that local communities are consulted in relation to the development of community facilities. We would like to see a
requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and
challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities
that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales’ push for local supply resilience, this is a major opportunity gap. Consider including the following wording:

“Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains.” This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or
urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: “Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing.”

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food
production, short supply chains or sustainable farming practices.
Consider including the following wording: “Development proposals should encourage short supply chains, low-carbon farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives.”

Change suggested by respondent:

Include the following wording: “Rural diversification
proposals that support agro-ecological farming, sustainable local food production, community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations.”

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

7241 Object

Document Element: EMP6 - NEW RURAL DIVERSIFICATION AND EMPLOYMENT USES IN THE COUNTRYSIDE
Respondent: Woodwise Ltd (Mr & Mrs S & K Williams) [3772]
Agent: Geraint John Planning Ltd

Summary:

Policy EMP6 'New Rural Diversification and Employment Uses in the Countryside' provides policy mechanism to support rural employment and diversification in the Vale. However, we consider that the policy does not go far enough to protect and enhance existing employment sites or, provide for opportunities to extend smaller businesses. We would therefore suggest that the following additional wording is added into Policy EMP6 outlined below:

It is considered that the employment strategy for the RLDP should go further to support the delivery of smaller employment sites, which would have the effect of a more balanced and equitable distribution of employment sites apportioned across the entire Plan area – including further sites around Cowbridge. The Employment Land Study (2023) highlights that there is a strong demand for B1, B2 and B8 premises within the rural Vale beyond the traditional rural enterprise and diversification of existing agricultural businesses. The proposed changes to Policy EMP6 would provide further support for existing businesses to redevelop or expand, creating better opportunities on existing sites, where there are limited impacts of redevelopment and expansion. Equally, additional employment allocations should be identified to ensure that the overall need is met over the Plan period. Failure to make the necessary changes to the Plan would bring into question the deliverability of the Plan, and by association, its “soundness”.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP)

Representations regarding the Deposit Plan Consultation – 'Crossways Estate, Cowbridge'

Please find enclosed, on behalf of and under instruction from our client, 'Woodwise Limited', representations for consideration as part of Vale of Glamorgan's RLDP Deposit Plan.

Context to these Representations

The above site has been submitted as a Candidate Site as part of the Deposit Plan consultation. The following has been submitted as part of this process:

- Candidate Site Submission (including Sustainability Appraisal and Assessment against Candidate Site Methodology);
- Site Location Plan (dwg ref. A101);
- Illustrative Site Layout plan (dwg ref. A112);
- Development Viability Model (dated March 2026) completed by HRT.

Having regard to the above information submitted, and in summary, it is considered that the site should be considered acceptable and appropriate as an employment site allocation, in light of the following conclusions drawn:

- The Sustainability Appraisal completed for the site confirms that the site has a range of positive impacts through its allocation for employment uses, and could assist in achieving the Plan's Sustainability objectives.
- In respect of assessing the site against the Candidate Site Methodology, the site is considered available for development and has a viable prospect of coming forward in the short term, for delivering further employment land in the plan period.
- The site has limited constraints, given that it is currently partially brownfield land and doesn't include any high grade agricultural land.
- The only policy destination for the site to overcome would be in relation to the SLA, which could be addressed through a Landscape and Visual Impact Assessment submitted as part of any future application.
- The site is located in the countryside but is brownfield and already a well-established existing business which has been running as an employment site for many years. It is considered that the redevelopment of this site presents an opportunity to develop the site for further uses, in order to realise the sites full potential.
- The site already benefits from existing connections to infrastructure such as water, electricity, gas and the local highway.
- The redevelopment of the site has the ability to make a positive contribution to placemaking and wellbeing.

We consider that the site 'performs' well against the defined assessment criteria and methodology, with no evident insurmountable constraints, obstacles, or failings. It has been demonstrated above that there are no insurmountable constraints to development of the site, which would represent an appropriate existing employment site allocation, with the ability to extend this further. Moreover, the site comprises previously developed land and benefits from existing permissions for its current use. As such, the site should be considered a 'reasonable' option, and should progress to the Stage 3 assessment accordingly.

Given that the site is not currently allocated in the Deposit Plan, we would raise an objection to the Plan in its current form, on the basis of the Candidate Site submission. Further details are included below.

Summary of these Deposit Representations – Employment Sites

In light of the Candidate Site Submission made by the site promotor, we would suggest that the site should form an employment allocation within the RLDP. As a result, the site promoter looks to raise an objection to the Deposit Plan.

Para 5.7 stats that the RLDP will make provision for "An allocation of 182 Ha of employment land across a range of sites to enable 67.8 Ha to be brought forward during the plan period and the delivery of up to 5,338 jobs". It is noted that there are currently a total of 8 sites highlighted as employment allocations in Policy SP14 'Employment Growth'. Policy EM1 also highlights two 'Employment Regeneration Opportunity Areas'.

Although there is no objection raised to the inclusion of the sites already identified within the policy in principle, it is considered that Crossways Estate site should be considered as both an existing employment site, which is located near to a sustainable settlement, but also has the ability to provide a larger area for employment, which would help to make the existing business more viable. As a result, it is considered that the site should be identified within the Policy EMP3.

Policy EMP3 'Protection of Existing Employment Sites and Premises' provides a policy which looks to safeguard existing employment allocations within the Vale. The policy states: "The following hierarchy of existing employment sites are safeguarded for B1, B2 and B8 employment uses, and will be protected from development which would compromise their role and function". These are split into Major Employment Sites, Secondary Employment Sites and Key Local Employment Sites. Although Para 6.290 highlights that "Other Premises in Employment Use" are also a type of employment site which has a role and function in the Vale. However, there are a range of smaller and more rural existing employment sites which are not identified or referenced within the policy. We consider that the policy does not go far

enough to protect other more rural existing employment sites, such as Crossways Estate.

Policy EMP6 'New Rural Diversification and Employment Uses in the Countryside' provides policy mechanism to support rural employment and diversification in the Vale. However, we consider that the policy does not go far enough to protect and enhance existing employment sites or, provide for opportunities to extend smaller businesses. We would therefore suggest that the following wording is added into Policy EMP6 outlined below in red:

"Proposals for new rural diversification, including tourism facilities, and B1, B2 and B8 employment uses within the countryside outside of defined settlement boundaries or employment areas identified in Policy EMP3 may be appropriate where the proposal is for:

- The re-use or adaptation of existing commercial premises or an existing rural buildings in association with a rural enterprise or farm diversification scheme;
- Small scale new building employment premises that are well related to a rural settlement, or lie within or immediately adjacent to an existing farm building complex;
- Employment uses where a countryside location is essential for the operational requirements that cannot be met on an existing employment area;
- Sustainable low impact tourism and leisure proposals.
- Small-scale extensions to existing employment sites"

It is considered that the employment strategy for the RLDP should go further to support the delivery of smaller employment sites, which would have the effect of a more balanced and equitable distribution of employment sites apportioned across the entire Plan area – including further sites around Cowbridge. The Employment Land Study (2023) highlights that there is a strong demand for B1, B2 and B8 premises within the rural Vale beyond the traditional rural enterprise and diversification of existing agricultural businesses. The proposed changes to Policy EMP6 would provide further support for existing businesses to redevelop or expand, creating better opportunities on existing sites, where there are limited impacts of redevelopment and expansion. Equally, additional employment allocations should be identified to ensure that the overall need is met over the Plan period. Failure to make the necessary changes to the Plan would bring into question the deliverability of the Plan, and by association, its “soundness”.

Conclusion

These representations raise objection to the Deposit Plan – for the reasons set out above.

Given the nature of these representations our clients would be happy to discuss any aspect of the submission made and credentials of the site when your Authority comes to evaluate matters.

We look forward to hearing from you in due course. In the meantime, however, we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Yours sincerely

Change suggested by respondent:

Policy EMP6 outlined should be amended to include the following additional text in brackets:

"Proposals for new rural diversification, including tourism facilities, and B1, B2 and B8 employment uses within the countryside outside of defined settlement boundaries or employment areas identified in Policy EMP3 may be appropriate where the proposal is for:

- The re-use or adaptation of [existing commercial premises or] an existing rural building[s] in association with a rural enterprise or farm diversification scheme;
- Small scale new building employment premises that are well related to a rural settlement, or lie within or immediately adjacent to an existing farm building complex;
- Employment uses where a countryside location is essential for the operational requirements that cannot be met on an existing employment area;
- Sustainable low impact tourism and leisure proposals.
- [Small-scale extensions to existing employment sites]"

Sound: No

Attachments:

Representation Form - https://valeofglamorgan.oc2.uk/a/436
Cover Letter - https://valeofglamorgan.oc2.uk/a/437
Candidate Site Assessment - Redacted - https://valeofglamorgan.oc2.uk/a/43v
Location Plan - Redacted - https://valeofglamorgan.oc2.uk/a/43c
Block Plan - Redacted - https://valeofglamorgan.oc2.uk/a/43w

5864 Support

Document Element: SP15 - SUSTAINABLE TOURISM

Respondent: Mr Jeff Smith [3399]

Summary:

Need to rapidly improve water quality in the area as this is having an impact of events

Full text:

Need to rapidly improve water quality in the area as this is having an impact of events

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6685 Comment

Document Element: SP15 - SUSTAINABLE TOURISM

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.
We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.
Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.
Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.

TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where "qualifying activities" take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have

influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states 'The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.'
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery. Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)
identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'

Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.
South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)

South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.

• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management

Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.

Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

5399 Object

Document Element: SP16 - CLIMATE CHANGE MITIGATION AND ADAPTATION

Respondent: Emma Reed [2653]

Summary:

This Policy should set a target for reducing the need to travel as well as a modal split target for every development site. At the moment the plan has words and lots of unsustainable development which will add to the global energy crisis.

Full text:

This Policy should set a target for reducing the need to travel as well as a modal split target for every development site. At the moment the plan has words and lots of unsustainable development which will add to the global energy crisis.

Change suggested by respondent:

Transport Modal split targets for new developments.

Protecting land from development where crops have been grown. This would include 1 2 and 3 a b and c.

Sound: No

Attachments: None

5710 Support

Document Element: SP16 - CLIMATE CHANGE MITIGATION AND ADAPTATION

Respondent: Cardiff Capital Region Energy (Mr Phil Nightingale, Project Delivery Director) [2736]

Summary:

CCR Energy welcomes the emphasis within SP16 on climate change mitigation and adaptation, including consideration of flood risk at the former Aberthaw Power Station. The proposed redevelopment of the site as the Cardiff Capital Region Aberthaw Green Energy Park will incorporate comprehensive Flood Consequence Assessments and appropriate mitigation measures to ensure safe, resilient development. By integrating sustainable drainage systems, green infrastructure, and regenerative design principles, the proposals will address tidal and fluvial flood risk, support climate resilience, and contribute to the Vale of Glamorgan's broader zero-carbon and environmental objectives, demonstrating exemplar practice in sustainable redevelopment of previously developed land.

Full text:

CCR Energy welcomes the emphasis within SP16 on climate change mitigation and adaptation, including consideration of flood risk at the former Aberthaw Power Station. The proposed redevelopment of the site as the Cardiff Capital Region Aberthaw Green Energy Park will incorporate comprehensive Flood Consequence Assessments and appropriate mitigation measures to ensure safe, resilient development. By integrating sustainable drainage systems, green infrastructure, and regenerative design principles, the proposals will address tidal and fluvial flood risk, support climate resilience, and contribute to the Vale of Glamorgan's broader zero-carbon and environmental objectives, demonstrating exemplar practice in sustainable redevelopment of previously developed land.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5711 Comment

Document Element: SP16 - CLIMATE CHANGE MITIGATION AND ADAPTATION

Respondent: Mr David Entwistle [3264]

Summary:

I support his in principle but feel many areas within the proposed LDP do not align with this policy. Many new housing developments proposed are on Greenfield sites in poor locations and will place heavy reliance on private vehicle use and associated contributions to climate change.

Full text:

I support his in principle but feel many areas within the proposed LDP do not align with this policy. Many new housing developments proposed are on Greenfield sites in poor locations and will place heavy reliance on private vehicle use and associated contributions to climate change.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5873 Support

Document Element: SP16 - CLIMATE CHANGE MITIGATION AND ADAPTATION
Respondent: Mr Jonathan Davies [3407]

Summary:
I fully support the ambition of VoGC to address, mitigate and adapt to anthropogenic climate change.

Full text:
I fully support the ambition of VoGC to address, mitigate and adapt to anthropogenic climate change.

Change suggested by respondent:
-

Sound: Not specified
Attachments: None

6044 Object

Document Element: SP16 - CLIMATE CHANGE MITIGATION AND ADAPTATION
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:
Policy SP16 requires all development proposals to address climate change causes, but it is impractical to meet all these requirements at the outline planning stage. Some information can only be provided at the detailed stage. Certain requirements, such as optimising energy supply and district heat networks, may be unachievable in many new residential developments. Furthermore, care needs to be taken to ensure that any additional decarbonisation policy aspirations, especially for affordable housing-led schemes, are carefully considered in terms of overall viability.

Full text:
It is observed that the wording of Policy SP16 states that “all development proposals” should address the causes of climate change to demonstrate policy compliance. However it is considered that it would not be feasible or even possible to provide all of the information required by Policy SP16 at the outline planning application stage and that some of the information requirements of Policy SP16 can only be expected to be provided at detailed (reserved matters/full) planning application stage. Furthermore, care needs to be taken to ensure that any additional decarbonisation policy aspirations, especially for affordable housing-led schemes, are carefully considered in terms of overall viability.

It is clear that there are some requirements in Policy SP16 that will be unachievable in many new residential developments, for example, requirements 7 relating to the optimisation of energy supply and distribution options, including provision of district heat networks.

Change suggested by respondent:
The wording of Policy SP16 must therefore be amended to acknowledge that the above list will apply to “All development proposals, where possible...”

The term “maximising” should also be removed entirely from Policy SP16 as the term is imprecise. Proposals should be encouraged to be efficient but to require demonstration of maximisation could also lead to viability issues.

The proposed amendments will ensure that Policy SP16 will meet the third test of soundness (Will the Plan deliver?).

Sound: No
Attachments: None

6079 Object

Document Element: SP16 - CLIMATE CHANGE MITIGATION AND ADAPTATION

Respondent: Barratt Redrow Homes [2669]

Agent: Lichfields

Summary:

Policy SP16 requires all development proposals to address climate change causes, but it is impractical to meet all these requirements at the outline planning stage. Some information can only be provided at the detailed stage. Certain requirements, such as optimising energy supply and district heat networks, may be unachievable in many new residential developments. Furthermore, care needs to be taken to ensure that any additional decarbonisation policy aspirations, especially for affordable housing-led schemes, are carefully considered in terms of overall viability.

Full text:

It is observed that the wording of Policy SP16 states that “all development proposals” should address the causes of climate change to demonstrate policy compliance. However, it is considered that it would not be feasible or even possible to provide all of the information required by Policy SP16 at the outline planning application state and that some of the information requirements of Policy SP16 can only be expected to be provided at detailed (reserved matters/full) planning application stage. Furthermore, care needs to be taken to ensure that any additional decarbonisation policy aspirations, especially for affordable housing-led schemes, are carefully considered in terms of overall viability.

It is clear that there are some requirements in Policy SP16 that will be unachievable in many new residential developments, for example, requirements 7 relating to the optimisation of energy supply and distribution options, including provision of district heat networks.

Change suggested by respondent:

The wording of Policy SP16 must therefore be amended to acknowledge that the above list will apply to “All development proposals, where possible...”

The term “maximising” should also be removed entirely from Policy SP16 as the term is imprecise. Proposals should be encouraged to be efficient but to require demonstration of maximisation could also lead to viability issues.

The proposed amendment will ensure that Policy SP16 will meet the third test of soundness (Will the Plan deliver?).

Sound: No

Attachments: None

6162 Object

Document Element: SP16 - CLIMATE CHANGE MITIGATION AND ADAPTATION

Respondent: Ms Lucie Taylor [2506]

Summary:

SF&G note the Vale's recognition of the climate crisis, with a focus on mitigation over adaptation in the draft plan. More focus on adaption is needed. We suggest emphasising community-scale actions such as community gardens, orchards, local food growing, green spaces, repair hubs, and tree planting for biodiversity and shading. The circular economy should include biological nutrients and community resource recovery. Green infrastructure should be multifunctional, incorporating community-managed green spaces with high biodiversity and food production. Nature-based solutions should also address social heat stress and mental health, beyond water management, by including urban gardens and permeable surfaces.

Full text:

The Vale has already recognised there's a climate crisis. The plan gives mitigation and adaption as the 2 elements, though perhaps the draft plan feels like it focusses more on mitigation with adaption being more secondary.

For SP16 we suggest more on community-scale climate action that help with food security, carbon sequestration, biodiversity gains, social cohesion, and cooling e.g.
community gardens and orchards
local food growing
shared green spaces
local repair and reuse hubs
tree planting (but not just for green design with the aesthetic/landscaping but trees for biodiversity, shading, food)

No. 2 Circular Economy, the statement focuses on buildings and materials.
The circular economy also applies to biological nutrients and waste.
Community gardens are hubs for the circular economy—composting local green waste and recycling nutrients back into the soil. Suggest adding "community-scale resource recovery" to the circular economy principles

No. 5 & 8 Green infrastructure, the 2 statements identify only carbon sequestration and urban shading & cooling. Green infrastructure should have multifunctional roles i.e. not just be "trees to look at". For GI there should be measurable standards. Welsh Government and NRW have spent considerable resources developing Green Infrastructure toolkits and these should be used better within the LDP.
Suggestion: that "Green Infrastructure" specifically includes Community Managed Green Space. These spaces provide higher biodiversity value and better social outcomes than "standard" landscaping PLUS food especially if orchards are planted.

No. 10 Nature-Based Solutions The policy links nature-based solutions primarily to water/flooding.
Nature-based solutions can also address social heat stress and mental health during extreme weather.
Suggestion: add community gardens, community allotments and orchards, which provide cooling and permeable surfaces while simultaneously tackling the "nature deficit" in urban areas.

Change suggested by respondent:

encouragement for community focussed initiatives that mitigate and help adapt to climate change.

Sound: No

Attachments: None

6733 Comment

Document Element: SP16 - CLIMATE CHANGE MITIGATION AND ADAPTATION

Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food
production, short supply chains or sustainable farming practices.

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning
guidance (SPG) proposed. We are keen to ensure that these SPG's are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are
involved in the development of some of these. The content and application of the SPG's will be fundamental to the effectiveness of several of the policies identified in the
deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community
amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient communities. The vision and strategic objectives currently contain no mention of ‘food’ or ‘farming’.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: “The Local Development Plan will support resilient and sustainable
local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part
of sustainable growth.”

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local
diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

“Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other
opportunities for local food production as part of multifunctional green infrastructure.”

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their
proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative
impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

6.54 We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live
full, productive and prosperous lives.'

6.60 We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid
HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to
ensure Developers submit a quality HIA and implement the conclusions.

6.61 Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

6.62 Wales Health Impact Assessment Support Unit has recently released guidance on HIA - see https://phwwhocc.co.uk/whiasu/ for more information and toolkits to ensure most up to date is in use.

6.63 Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the community..'.

6.65 Suggestion to change wording from 'encouraged' to 'expected' for example:
Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of

healthcare infrastructure requirements.' The requirement
for HIA will assist with this expectation.

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference “enhancements to leisure, sport and recreation spaces”. Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation. It is recommended that the Key Site schedules include minimum on-site provision standards and delivery
phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population
growth.

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail
centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer
supply chains. This limits opportunities for strengthening local food economies.
It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for ‘local affordable food’ outlined in SP5.

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach.”

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to
consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and
Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: “Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food
infrastructure within walking distance of new residential areas.” This addresses diet related health inequalities, encourages healthier communities and aligns with HIA
guidance.

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply
chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable
agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models.

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses - to include the following wording: “Rural diversification proposals that support agro-ecological farming, sustainable local food production,
community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations.”

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel
Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022
01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing
flooding and making use more comfortable during hot weather (such as shading from trees). We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

SP13 Community infrastructure and planning obligations:

We want to take this opportunity to highlight the challenges that population growth places on healthcare
services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure. Please refer to the information provided as part of the background evidence paper titled 'BP37
Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within
existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing

estate (where feasible) or support new
developments to take forward its strategic objectives.

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space Assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres. Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.”
There is no reference to the expectation that local communities are consulted in relation to the development of community facilities. We would like to see a
requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and
challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities
that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales’ push for local supply resilience, this is a major opportunity gap. Consider including the following wording:

“Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains.” This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or
urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: “Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing.”

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food
production, short supply chains or sustainable farming practices.
Consider including the following wording: “Development proposals should encourage short supply chains, low-carbon farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives.”

Change suggested by respondent:

Consider including the following wording: “Development proposals should encourage short supply chains, low-carbon farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives.”

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

6941 Support

Document Element: SP16 - CLIMATE CHANGE MITIGATION AND ADAPTATION

Respondent: Penarth Town Council (Mr Pete Newton, Principal Policy, Innovation and Development Officer) [1125]

Summary:

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16.

Full text:

Penarth Town Council Deposit RLDP Consultation Response

Comments collated at a meeting of the Council’s Consultation Task and Finish Group on 9th February 2026

Some Members attended the RLDP consultation drop-in session in Penarth and in general found it to be very informative.

Members support the general development strategy but did note the lack of information concerning discussions with adjacent and other nearby Principal Councils in the CJC Region. In view of the forthcoming Strategic Development Plan, encompassing the ten authorities, members felt that some further commentary regarding this is warranted.1

It is clear that the approach taken in the Cardiff paper is still that ideally, each Council is self-contained and "consumes its own smoke," which does not show any wider strategic thinking between the ten authorities in preparation for a regional Strategic Development Plan.

Members agreed with the view that infrastructure to support new housing developments was required in order to create successful developments, although they acknowledged that logistically it was difficult to pre-empt demand for some services such as travel and health services. Members also noted that predicting developmental needs and opportunities within wider context surrounding the UK's economic, political, and social landscapes.

Members noted that there was not much focus on Penarth or identified potential future development for Penarth beyond that already underway at the location near to Cosmeston but welcomed flexibility in its approach. Members expected to be more closely involved in the decisions and planning of this, and other such developments, and provide opportunity for wider consultation where appropriate, such as pre-application consultations, as well as would expect to be included in consultations concerning sites adjacent to Llandough, Dinas Powys, and Sully given their impact upon the town.

Penarth as a town is currently developed to its boundaries, save for the development at Cosmeston. It is, therefore, more dependent than other Service Centres on windfalls of land or buildings which may arise during the currency of the Plan. In 2023, an extensive assessment of the potential of the town concluded the following:

"There is marginally less capacity in Penarth [and Llandough] than the projected figures. However, this does not mean that the projections are incorrect or unjustifiable. The reported figures have not included a significant amount of capacity on open space land, and the projected figures for conversion of existing buildings and intensifications will be surpassed if the extant consents that exist this early in the Plan period are implemented."

The degree of flexibility, however, is substantially depending on one large site. P009, Headland School, is identified as both a potentially disused building and as a site with a capacity of 111-120 units. This special school is full to capacity and used by many Council in both Wales and England.

Members did note the inclusion of Cogan Transport Interchange under section 6.196 but would have liked to see more information about its future developments as they see it as key to increasing public transport use to Barry and further to West Wales in general.

Members wished to advise that issues with both the bridge and the platforms at Cogan have been long term, with accessibility being central to these issues. Members felt that improvements to accessibility should be a priority at this site, with planting and landscaping considered secondary to this.

Members felt it was key to consider the additional stress on Penarth from increased anticipated demand of public transport needs and emphasised the need for this to be aptly considered by bus route providers as part of development work.

Members wanted to see a strategy that actively protects the town's heritage and culture whilst still being able to provide for current and future generations.

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16 and section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report2, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Under CC2, it was noted that the presumption against demolition3 in favour of retrofit and reuse may constrain maximum transition to net zero as, whilst there is grant aid available for public buildings and social housing, the retrofit monies available for private stock is limited.

Additional considerations will also need to be made as part of the Third Carbon Budget (2026-2030), Local Area Energy Plans and the climate change ISA theme.

Members also felt similar about the inclusion and consideration of sustainable development through the specific strategy outlined in section 5 of the document and felt this linked in well with ongoing Placemaking work and its strategic approach as detailed in SP4.

Members were pleased to see mention of the diversification of high streets, although noted that Penarth was above average in terms of occupancy. They hoped that the RLDP would be able to support the town centre and support other ways it could be improved, such as a fishmonger or identifying a site for a new Cemetery.

With Penarth classified as a Service Centre, they are identified as having a defined role. However, the decline of in-person retailing means that defining role is not that evident, and Members felt there is potentially a need to move away from the traditional retail role of Town Centres in favour of "repurposing, creating multifunctional, commercial, and service centres that meet the needs of the communities they serve" in line with Future Wales Town Centre First Policy. The term 'repurposing' suggests a stronger role for the public sector in enabling these new purposes, and Members felt that Placemaking Plans could be one potential framework for this.

Members felt that potential functional support that could be provided could include:
• The appointment of a Town Centre Manager
• Using supporting interventions such as an extension or reshaping of normal services such as Neighbourhood Services.
• Using existing or emerging new powers, such as compulsory purchases.

Members wished for the RLDP to facilitate the safeguarding of essential public services, including health, policing, fire and rescue in the town, which would help to develop the defining role of a Service Centre, and felt that specific reference to these would be beneficial.

Members supported the avoidance of coalescence with adjacent settlements through the reconfirmation of Green Wedges as it allows for relevant extensions to those settlements whilst allowing them to retain their identity.

Members noted that the Quiet Area provision under DNP6 only applies to Penarth and wished to know why this was the case.

Members advised that they welcomed further opportunity for consultation, particularly in relation to developments in the neighbouring Cardiff Bay area whilst acknowledging that this is not necessarily an RLDP concern.

Footnotes

1 There is an evidence paper concerning relations with Cardiff and a Statement of Common Ground with Bridgend. However, there is only a reference in the RLDP text to discussions with other regional Councils and not the paper itself. We would be grateful if you could provide the paper as it does impact on the soundness of this Plan.

2The UK Climate Change Committee's 'Progress Report: Reducing Emissions in Wales' highlighted the following aspects of import: Skills, Vehicle Charging Networks, Improving Recycling, Energy Plans, Decarbonising Public Buildings and Social Housing, and reducing Road transport Demand (Car-Kilometres).

3The UK Environmental Audit Committee (2022) noted that "the evidence we received consistently recommended that retrofit and reuse be prioritised over new build."

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3d5

6969 Support

Document Element: SP16 - CLIMATE CHANGE MITIGATION AND ADAPTATION

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037

Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
Our representations on the site allocations are included in appendix 2.
We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the ‘domestic’ supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge

consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.
Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site
Our representations on site allocations are provided in the table below. The following caveats are applicable to all sites:
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion.
• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
The following provisions are applicable to all allocated employment sites:
• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be

undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
• Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcements.
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

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Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

7198 Support

Document Element: SP16 - CLIMATE CHANGE MITIGATION AND ADAPTATION

Respondent: H Jones, L Sungur and P John [3741]

Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

The provisions of SP16 are generally supported as practical measures to ensure important sustainable development is achieved.

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis. Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

The inclusion of the site within the settlement boundary is logical especially when viewed in the context of the linear settlement of Fferm Goch. In addition the site is further suited to development allocation as the northern and southern boundaries are built up and the main road runs along the eastern boundary. A flexible approach is encouraged with regard to the delivery of the dwellings in relation to a variety of factors and policy provisions including the housing needs across the Vale, the limit on numbers of rural affordable led sites in minor rural settlements, viability implications relating to obligations/carbon Zero and sustainability obligations and the potential to extend the allocation if the need for homes requires.

The 3 land owners remain committed to this development and local developers are waiting to deliver the allocation.

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

The test of soundness for a Local Development Plan (LDP) is a critical component of the planning process to ensure that the plan is prepared in accordance with legal and procedural
requirements. It involves demonstrating that the plan is 'sound' based on three tests set out by the Welsh Government in

the Development Plans Manual (Edition 3). These tests have therefore been considered in our representation, the tests include:

• Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)
• Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
• Test 3: Will the plan deliver (i.e. is it likely to be effective?)

SP1 – Sustainable Growth Strategy

The promotion of small scale affordable housing led development outside of the SGA, as proposed by SP1 is important as this provides essential affordable and market homes in the rural locations of the Vale as well as the SGA. Their provision is critical in meeting the area's housing needs, particularly affordable dwellings and supporting rural community stability, and ensuring that all parts of the Vale remain a place where people of all incomes are able to live and thrive during the plan period to 2036 and beyond.

The essence of Policy SP1 is supported, however it is well documented that there is a backlog in delivery of affordable homes and the need for affordable housing in the Vale is exacerbated by the high prevalence of single person households plus households comprising couples with no children, The Vale also has one of the highest affordability pressures in Wales. As stated in the 2023 Local Housing Market Assessment (LHMA) for the Vale of Glamorgan , the median house price in the Vale is around 8 times the median household income, well above the affordability threshold of 4.5 to 5 times household income for borrowing purposes. Private rents have also risen sharply in the area, commonly placing them out of reach for many low-to-middle income households. All of the above place further pressure on the need to deliver affordable homes in the locality.

The LHMA identifies a need for 1,075 affordable homes per year over the next 5 years based on principal projections (or 1,114 based on the RLDP projections). As mentioned previously past delivery rates fall significantly short and therefore a backlog is present, however despite the reported backlog the RLDP only proposes 3,070 (205/annum) affordable dwellings over the plan period to 2036. Despite the growth strategy of policy SP1 and allocations made through the RLDP, the figure of proposed affordable dwelling numbers is concerning as it falls significantly short of the demand evidenced within the most recent evidence of LHMA of 2023.

The housing figures quoted in SP1 indicate 7,890 dwellings (including the 3,070 affordable dwellings) to 2036, however these figures overall are inadequate over the plan period when considered against the 2022 WG household projections. The 2022-based household projections provide an indication of the future number of households, and their composition, based on population projections and assumptions about households from recent censuses. The vale of Glamorgan demonstrates an increase of almost 12% in the number of households between mid-2022 and mid-2032; note this is the highest percentage increase by Local authority in Wales and way above the average for Wales as a whole (that stands at around 7% increase). The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both open market, but particularly Affordable) development across the Vale.

Without targeted allocations outside of the SGA, as outlined in Policy SP1, the gap described above will continue to widen, forcing more residents to leave the area and weakening community cohesion.

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the RLDP the supporting text of Policy SP2 states:
'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

sustainable growth. Locating affordable-led developments in areas with existing infrastructure such as primary schools will reduce car dependency, lower carbon emissions, and contribute to the Council's climate change commitments.

Considering the above, the limit on small scale rural affordable housing led developments (RAHLD) to 25 for these settlements is questioned and further flexibility recommended on a case by case basis. It is understood the limit on numbers was imposed due to the existing scale of the settlement in which the RAHLD are located, however those allocations will only likely deliver at 50% affordable and therefore only provide 12.5 (or 13) affordable units as a

maximum (note Fferm Goch would provide 11 affordable dwellings on current figures of 22 total dwellings). Given the concerns raised in response to Policy SP1 there remains an issue of whether the numbers proposed in the RLDP can meet the demonstrable need for affordable homes and if there is scope on a RAHLD to sensitively increase unit numbers without any material harm then the policy should be flexible to accommodate this.

Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the range of facilities and services provided in these settlements. It is also supported that these settlements are able to provide affordable led residential development of up to 50 dwellings (delivering 25 affordable units). However the provision of an increased number of units in the Primary Non SGA settlements must not be at the expense of a wider number of smaller rural sites with the ability to sustain smaller communities across the Vale, especially given the shortfall in numbers as outlined above.

PGD2 – Residential Development Densities

The best use of finite land is set out in PPW and consistent with the setting of the densities as prescribed in policy PGD2. The policy is considered to meet the 3 tests of soundness.

The approach of policy PGD2 is also supported through the proposed density of the site North of Westwinds business park, Fferm Goch in HG4 (4). This allocation that proposes to provide a density of just over 30/ha within Fferm Goch, a minor rural settlement.

SP6 – Housing Requirement

Affordable housing forms an important part of the housing requirement figures of Policy SP6. Whilst the total 122 dwellings proposed under policy HG4 is a relatively small contribution to the overall figures it provides important spatial distribution of homes across the Vale within the rural area.

Given the concerns raised with regard to Policy SP1 there is fear that the affordable housing numbers will not be sufficient to meet need. The site north of Westwinds business park, Fferm Goch has the ability to expand to the south (as per the CS Ref 398) in order to accommodate additional dwellings (both market and affordable dwellings in order to sustain the viability of the site).

SP7 – Affordable Housing Provision

In accordance with Policy SP7 the allocated site HG4(4) at Fferm Goch provides a range of tenures, types and sizes in response to the LHMA, waiting list data and Older persons housing strategy in order to provide for 11 dwelling units and contributing toward the 3,070 affordable requirement to 2036. Changes in the household composition mean more single person and small homes are required, plus older person accommodation for those wishing to downsize and stay in the area.

Please see comments for Policy SP1 / Policy SP2 above regards concern over the proposed housing numbers and supply of affordable homes against demand - this therefore brings the Deliverability of the plan in to question (Test of Soundness 3).

SP8 – Affordable Housing Requirements

Policy SP8 is supported in so far as contributing much needed affordable housing development commensurate with the size of the settlement in which it sits. We are encourage to see reference to the provision of affordable housing to be negotiated on a site by site basis considering evidenced viability fo the development.

The affordable dwellings proposed foster stability in rural areas by allowing a range of households (from single person to growing families) to stay in their local area.

Policy SP8 states 40% affordable for those developments in primary and minor settlements outside of the SGA yet 50% requirement on affordable housing led allocations in minor rural settlements (also outside of the SGA). This appears inconsistent and penalising those smaller rural sites that will already be more delicately balanced in viability terms by virtue of their limited size of 25 units. Further viability issues covered in other policies (such as SP20, relating to biodiversity, Net Zero and sustainability credentials must (with the required evidence submitted and assessed by the council as stated in Policy SP8) be flexibly reviewed to ensure sites are viable and deliverable as recognised by the Council, there is a danger the stringent requirements, especially for smaller sites, could render those sites unviable in the current climate with rising build costs.

HG4 – Rural affordable housing led sites

The allocation of land north of West Winds Business Park under policy HG4(4) for rural affordable housing led development of 22 units is strongly supported. Then allocation will assist in delivering homes in the rural Vale and contribute to the important stability to the settlement of Fferm Goch to 2036.

The extension of the settlement limit including the site north of West Winds Business Park is supported. The site provides an obvious infill to the small break in the built up area to both the north and south of the site, with the main road running to the eastern boundary of the site.

The inclusion of the site within the settlement of Fferm Goch is logical and in harmony with the existing linear settlement.

The proposal supports the aims of the Local Development Plan and the Welsh Government's commitment to increasing affordable housing supply. By providing for affordable led allocations the policy aligns with the Well-being of Future Generations (Wales) Act 2015 in aiming to promote a healthier, more equal, and cohesive community.

There is concern however surrounding the number of dwellings proposed and if the Plan seeks sufficient dwellings and affordable provision given the predicted need to 2036 shown in the LMHA.

SP13 – Community infrastructure and planning obligations

Policy SP13 demonstrates the importance of community infrastructure in sustaining both the residents well being and economic growth of an area. See also the response to Policy SP2 that refers to the allocation of housing in the rural areas specifically supporting those settlements with local primary school provision.

The viability of developments however must not be compromised in order to ensure delivery of the plan. To see in Policy SP13 that 'development viability' is recognised as a key factor in delivering community infrastructure under planning obligations, is supported. It is recommended that this recognition is replicated in other policies of the LDP in order that the third Test of soundness can be fully met; Deliverability – ensuring the plan is likely to be effective). See comments in relation to Policies SP8/CC1/SP16/CI1.

CI1 – Open Space Provision

Provision of open space in residential developments is supported. HG4(4) promotes open space within the draft allocation.

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

The provisions of SP16 are generally supported as practical measures to ensure important sustainable development is achieved.

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

Provision of Green Infrastructure in residential, and all developments is supported.

HG4(4) retains and enhances existing and will promote green infrastructure on the draft allocation.

The viability of developments however must not be compromised through green infrastructure provision - in order to ensure delivery of the plan. The 'development viability' should therefore be recognised as a key factor in delivering Green Infrastructure. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

Fferm Goch is one of the settlements that remains fully within and covered by the Upper and Lower Thaw Valley Special Landscape Area (SLA). It is noted that in such settlements, while there have been amendments to the identified settlement boundary (inclusion of HG4 (4) rural affordable led housing allocation) this has not affected the SLA designation in these areas. (Background Paper 45; Paragraph 1.16 refers).

The location of the small allocated site HG4(4) is nestled within the settlement of Fferm Goch. It is built up on both the northern and southern boundaries, with the main road running along the eastern boundary. There is no unacceptable harm to the SLA of the Upper and Lower Thaw valley.

The allocation of the site for residential development does not give rise to unacceptable harm to the special qualities and characteristics of the SLA, based on LANDMAP information, continues to be preserved.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

7227 Object

Document Element: SP16 - CLIMATE CHANGE MITIGATION AND ADAPTATION

Respondent: Ms Lynne Squires [3520]

Summary:

I am concerned that, as drafted, the Plan does not provide enough evidence or practical measures to ensure new development is sustainable and climate resilient. The RLDP is not fully justified, effective, or consistent with national policy on climate change and sustainability.
Key gaps include alignment with carbon reduction targets, enforceable delivery of low carbon travel, energy-efficient homes, sustainable drainage, and climate-resilient
infrastructure.
Without clear policies and enforceable commitments on low-carbon travel, energy-efficient homes, sustainable drainage, and climate-resilient infrastructure, the Plan risks harming both the environment and the wellbeing of communities.
I am worried that the Plan relies too much on people walking, cycling, or using public transport without clear plans to make this happen.
There is also little information on whether new homes will be energy-efficient or if systems to manage rainfall and reduce flooding (like sustainable drainage) will be properly installed and maintained.
I want to see clear, practical measures to make low-carbon travel, energy-efficient homes, and safe drainage a reality.
The Plan does not clearly show how new developments or existing infrastructure will be designed to cope with the risks of extreme weather events.
I would like to have assurance that any buildings, roads, drainage, and community facilities will be climate-resilient and protect people's health and safety.

Full text:

1. Air Quality and Traffic
The RLDP has not been supported by a sufficiently robust, transparent and locally specific
evidence base in relation to traffic capacity, mitigation, air quality and sustainable transport delivery in Dinas Powys.
The Plan relies on high-level assumptions rather than detailed assessments of known local constraints, and it does not provide adequate certainty that necessary mitigation and sustainable transport measures will be delivered, funded and implemented in a timely manner.
As a result, there is a significant risk that the cumulative impacts of development will lead to increased congestion, adverse effects on air quality and a deterioration in the quality of life for existing and future residents.
Until these evidence gaps are addressed and clear, enforceable measures are put in place, the RLDP cannot be considered fully justified, effective or consistent with national policy in its application to Dinas Powys.
Traffic Capacity
I am concerned that the RLDP has not demonstrated that the existing road network in Dinas Powys can cope with the scale of development proposed. Roads and junctions within the village already experience significant congestion both at peak times and throughout the day, particularly along Cardiff Road, St Andrew's Road and the A4055.
The Plan does not provide clear or accessible evidence, such as detailed junction capacity assessments or peak-hour traffic modelling, to show that additional development will not worsen these problems. Without this information, I cannot be confident that growth can be accommodated without unacceptable impacts on daily travel, safety and quality of life.
Questions: Can the Council confirm that the existing highway network in Dinas Powys can accommodate the growth proposed in the RLDP without causing unacceptable congestion?
Can the Council provide evidence including junction capacity assessments and peak hour traffic modelling?
Mitigation Measures
Where development in Dinas Powys is likely to increase traffic, I am concerned that the RLDP does not clearly explain how congestion will be mitigated.
Mitigation measures are described in general terms, but there is little clarity on what will actually be delivered, when it will happen, or who will pay for it. There is also no clear reassurance that mitigation will be in place before development

takes place.
I am concerned that traffic conditions could deteriorate further if development proceeds without effective safeguards.
Questions: For any development allocations in Dinas Powys that may impact congestion, what measures are proposed to mitigate these effects?
Are these measures fully funded, deliverable, and enforceable?
Air Quality Impacts
Increased traffic has clear implications for local air quality, particularly in residential areas and near schools and community facilities. I am concerned that the RLDP has not clearly assessed how the proposed growth in Dinas Powys will affect air quality, especially when the cumulative impact of multiple developments is considered.
The Plan does not explain how compliance with statutory air quality standards will be monitored or maintained as traffic levels increase. This creates significant uncertainty about potential impacts on public health and the local environment.
Questions: Has the Council assessed the likely impact of the proposed growth on local air quality in Dinas Powys, including cumulative effects?
How will the Plan ensure compliance with statutory air quality standards?
Sustainable Transport
While the RLDP refers to encouraging walking, cycling and public transport, I am not convinced that realistic alternatives to car/motor use will be delivered in Dinas Powys.
There is limited detail on specific improvements, timescales or funding for sustainable transport. Without frequent, reliable public transport and safe, direct walking and cycling routes, it is unlikely that car use will reduce in practice.
As a result, traffic growth and air quality impacts may be greater than the Plan assumes.
Question: How does the Plan/Council intend to ensure that sustainable travel options (walking, cycling, public transport) will be delivered and used to reduce traffic and air quality impacts in Dinas Powys?
Evidence Gaps
Overall, I am concerned that key evidence relating to traffic and air quality in Dinas Powys is either missing or insufficiently detailed. Without clear, locally specific assessments, it is difficult to understand how the Council can be confident that the Plan is sound or that its impacts on the community are acceptable.
Question: There are limitations in the transport and air quality evidence for Dinas Powys, how does the Council justify that the RLDP remains sound in light of these uncertainties?
2. Flood risk
I am concerned about the Replacement Local Development Plan (RLDP) and its impact on Dinas Powys, in relation to flood risk.
Dinas Powys already experiences surface water flooding, overloaded drains and pressure on local watercourses. Any new development must be proven to be safe and must not make these problems worse. At present, the RLDP does not give me confidence that this has been properly addressed.
Flood Risk Has Not Been Properly Resolved
Welsh Government policy (TAN 15) says new development must be safe from flooding for its lifetime and that flood risk should be dealt with when the Plan is written, not later on.
The RLDP appears to allocate sites that are affected by flood risk without clearly showing how they can be made safe. Instead, it relies on the idea that solutions will be worked out later when planning applications are submitted. As a resident, this is worrying, as there is no guarantee that those solutions will ever work or be delivered.
Questions: Can the Council explain how allocations within [or affecting] TAN 15 flood risk areas comply with TAN 15's requirement that development be flood-safe for its lifetime, rather than relying on mitigation to be designed later?
Where the Plan relies on mitigation to address flood risk, what evidence demonstrates that such mitigation is deliverable, funded, and capable of implementation within the Plan period?
Is it the Council's position that compliance with TAN 15 can be deferred to the planning application stage, and if so, how does that align with the requirement for strategic flood risk to be resolved at plan-making stage?
Lack of Clear Evidence Behind Flood Assessments
The flood studies supporting the Plan are not easy for a lay person to understand and do not clearly show that the full impact of new development has been properly assessed.
In particular, it is unclear whether:
• The combined effect of multiple new developments has been considered
• The worst-case impacts of climate change and heavier rainfall have been tested
• Flood risk to existing homes and streets has been fully taken into account
Without this information, it is hard to see how the Council can be confident that new development will not increase flooding in Dinas Powys.
Questions: What level of modelling underpins the SFCA, and can the Council confirm whether it assesses downstream and off-site impacts arising from cumulative
development?
Does the SFCA test a 'worst-case' climate change scenario consistent with current Welsh Government guidance, and if not, why not?
How does the SFCA move beyond a desktop exercise to demonstrate that individual allocations are genuinely developable without increasing flood risk elsewhere?
Too Much Reliance on Future Drainage Solutions
The Plan relies heavily on Sustainable Drainage Systems (SuDS) to manage surface water, but there is little evidence showing that these systems can realistically work on all proposed sites.
I am concerned that:
• There may not be enough space on sites for effective drainage
• Water will still end up flowing into already stretched drains and streams

• Long-term maintenance of drainage systems is unclear
If these systems fail or are not properly maintained, flooding problems could become worse over time.
Questions: What evidence does the Plan rely on to show that SuDS can be accommodated on all relevant allocations without loss of developable area or displacement of flood risk?
Has the capacity of receiving watercourses and drainage networks been assessed at a strategic level, or is this assumed to be resolved site-by-site?
How does the Plan address the cumulative impact of multiple SuDS systems discharging into the same catchment?
What mechanisms are proposed to secure long-term maintenance of SuDS, and where is this evidenced in the Plan?
Doubts About Whether Sites Are Truly Deliverable
Some housing numbers in the Plan appear to depend on sites that may only work if major flood prevention measures are put in place, I believe that Dinas Powys is an example of this.
• It is not clear which sites depend on such measures
• There is no clear timetable or funding in place
• There is no backup plan if flood mitigation does not happen
I am concerned that the Plan may be relying on sites that cannot realistically be developed.
Question: Can the Council identify which allocations are dependent on flood mitigation infrastructure, and where the delivery, timing, and funding of that infrastructure are set out?
If mitigation fails to come forward, what contingency does the Plan provide to ensure housing delivery does not rely on undeliverable sites?
How does the Plan demonstrate that housing numbers are not inflated by sites whose flood risk constraints may ultimately prevent development?
Where NRW has expressed concerns or conditions relating to flood risk, how has the Council reflected those concerns in policy or allocations, rather than deferring them to later stages?
Has any NRW advice been departed from, and if so, what is the evidence base justifying that departure?
Climate Change and Long-Term Safety
Flooding is likely to become more frequent and severe due to climate change. The Plan does not clearly show that new development in or around Dinas Powys will remain safe for decades to come, not just during the Plan period.
Residents need reassurance that today's decisions will not create long-term flooding problems for future generations.
Question: How does the Plan ensure resilience to increased rainfall intensity and flood frequency over the full lifetime of development, not just the Plan period itself? Does the Plan assume future flood defences or upgrades, and if so, where are those projects committed and funded?
For these reasons, I believe the RLDP has not properly resolved flood risk issues affecting Dinas Powys, I ask that the Council be required to:
• Properly address flood risk at the plan-making stage, not later
• Remove or review sites where flood risk has not been clearly resolved
• Provide stronger evidence that new development will not increase flooding for existing residents.
Until this is done, the Plan cannot be considered sound.
3. Wastewater Treatment
This objection relates to the proposed level of housing growth in Dinas Powys and whether the existing wastewater and sewerage system can safely and realistically support it.
I am concerned that the RLDP does not provide clear, settlement-specific evidence to show that wastewater treatment works and the local sewer network have enough capacity to accommodate the planned development, either now or within the Plan period.
Without this evidence, the Plan risks placing unacceptable pressure on already constrained infrastructure, increasing the risk of flooding and environmental harm.
Wastewater Treatment Capacity
The RLDP does not clearly explain whether the wastewater treatment works serving Dinas Powys has sufficient spare capacity to deal with additional development.
In particular, the Plan does not set out:
• how much wastewater the treatment works is currently allowed to treat (its "consented capacity"),
• how much spare capacity is actually available,
• when this information was last assessed, or
• whether this assessment has been formally confirmed by Dŵr Cymru Welsh Water.
Without this basic information, I lack sufficient information to understand whether the existing system is already close to capacity or whether it genuinely has room to cope with new development.
The Plan also does not clearly state how much additional wastewater would be generated by the new housing proposed for Dinas Powys, or how this compares with any available
capacity. This makes it impossible to judge whether the level of growth proposed is realistic.
There is no clear evidence that a Dinas Powys–specific assessment has been carried out. If the Council is relying on broad, county-wide modelling instead, this does not reflect local conditions or known issues within the village.
Sewer Network Constraints & Flood Risk
Many residents are already aware of problems with drainage, surface water, and sewer performance in Dinas Powys, particularly during periods of heavy rainfall.
However, the RLDP does not provide clear evidence on:
• existing sewer surcharging or flooding incidents,
• past or current problems with overloaded sewers, storm overflow activity affecting the area.
There is also no clear explanation of how the combined impact of multiple new development sites in Dinas Powys has been assessed together, rather than individually. This is especially concerning given the increasing frequency of intense

rainfall linked to climate change.
Dinas Powys has known surface water and flood risk sensitivities, yet the Plan does not convincingly demonstrate that increased wastewater flows will not make flooding worse or lead to pollution of local watercourses.
I am concerned that problems will only become apparent after development has already taken place.
Deliverability & Infrastructure Planning
The RLDP does not identify any specific wastewater or sewerage upgrades needed to support the proposed growth in Dinas Powys.
Where upgrades may be required, the Plan does not explain:
• what infrastructure improvements would be needed,
• how much they would cost,
• who would pay for them, or
• when they would be delivered.
This creates significant uncertainty. I am concerned that development could go ahead before infrastructure is in place, leaving existing communities to deal with the consequences of overloaded systems.
There is also no clear explanation of how infrastructure will be phased to ensure that wastewater capacity is available before new homes are occupied, rather than relying on solutions being found later.
Role of the Statutory Undertaker – Dŵr Cymru Welsh Water
The Plan appears to rely heavily on future discussions with Dŵr Cymru Welsh Water at the planning application stage to resolve wastewater issues.
I am concerned that this approach puts off important decisions that should be made now, during the Plan-making process. National planning policy requires development plans to be based on a clear understanding of infrastructure capacity, not assumptions that problems can be fixed later.
Without clear, written confirmation from Dŵr Cymru Welsh Water that the proposed level of growth in Dinas Powys can be accommodated, I believe the Plan lacks the certainty needed to be considered sound.
Soundness & Policy Compliance
Because the RLDP does not clearly demonstrate that wastewater infrastructure:
• is available,
• can be upgraded in time, and
• has a realistic and funded delivery plan,
I do not believe the Plan is effective, which is a key test of soundness.
The Plan also appears to conflict with Planning Policy Wales, which states that development should be directed to locations where infrastructure is already in place or can be secured.
Deferring wastewater solutions to a later stage does not meet this requirement.
If wastewater capacity problems cannot be resolved within the Plan period, I question why the level of development proposed for Dinas Powys has not been reduced to reflect real infrastructure constraints.
4. Green Space & Green Infrastructure
For the reasons set out below I consider that the RLDP is unsound in relation to green space and green infrastructure in Dinas Powys because it:
• Fails to justify the loss of existing green space or show that mitigation will be delivered;
• Lacks clear evidence on the quantity, quality, and accessibility of green space;
• Does not safeguard the integrity of green infrastructure networks;
• Provides no mechanisms to ensure timely delivery of green space alongside new development;
• Does not demonstrate that alternatives were properly considered through the Sustainability Appraisal.
Until these issues are addressed, there is no clear basis to conclude that the proposed growth in Dinas Powys can be accommodated without unacceptable impacts on local green spaces and the wider environment.
I urge the Council to carefully consider these concerns and provide further evidence or modifications to ensure that the Plan is effective, sustainable, and compliant with national planning policy
Protection of Existing Green Space
The RLDP does not clearly explain why any existing green spaces in Dinas Powys might be lost, or whether the loss is unavoidable.
I am concerned that the Plan does not demonstrate:
• that all alternatives to protect existing green space have been considered, or
• that any replacement or mitigation will be provided within or near the village.
Without this evidence, there is no assurance that valued local green spaces, which are important for recreation, biodiversity, and the character of the settlement, will be preserved. This is a serious omission that makes the Plan unsound in this respect.
Question: How does the Plan justify the loss of any existing green spaces in Dinas Powys? Has an assessment been carried out demonstrating that loss is unavoidable, and that adequate replacement or mitigation will be provided within or near the settlement?
Quantity, Quality, and Accessibility of Green Space
The RLDP does not provide clear, settlement-specific information about the amount, quality, or accessibility of green space for Dinas Powys residents.
It is unclear whether the standards being applied:
• meet national policy requirements,
• reflect the needs of the local population, or
• will be sufficient to support an increased population from new housing.
Without clear evidence, I cannot be confident that new development will maintain adequate recreational and amenity space for all residents.

Question: What evidence supports the quantity, quality, and accessibility standards for green space in Dinas Powys? How do these standards compare with national policy and the needs of the local population?
Green Infrastructure Network Integrity
The Plan does not explain how green infrastructure networks—including wildlife corridors, footpaths, cycleways, and recreational routes—will remain coherent and functional as new development comes forward.
There is a real risk that the proposed growth could fragment these networks, reducing connectivity for wildlife and limiting access to recreational spaces. I am concerned that the Plan does not set out measures to prevent these negative impacts.
• Question: How does the Plan ensure that green infrastructure networks in Dinas Powys, including wildlife corridors, footpaths, and recreational routes, remain coherent and functional despite new development?
Delivery and Implementation
The RLDP does not make it clear how green space provision will be delivered at the same time as development, rather than being left to later planning agreements or discretionary decisions.
Without clear delivery mechanisms, there is no certainty that new or replacement green space will be provided when needed.
This creates risk that residents will face reduced access to recreation, wildlife habitats, and open space for years after new homes are built.
• Question: What mechanisms are in place to ensure that green space provision in Dinas Powys will be delivered alongside development, rather than deferred to later discretionary planning stages?
Consideration in the Sustainability Appraisal
It is not evident that the Plan's Sustainability Appraisal has fully assessed the impact of proposed development on green space and green infrastructure in Dinas Powys.
There is no clear explanation of whether alternative development options were considered that would reduce the loss or fragmentation of green spaces, and if so, why these
alternatives were rejected.
I am concerned that the lack of settlement-specific analysis weakens the credibility of the Plan and its ability to safeguard local environmental assets.
Question: Has the Integrated Sustainability Appraisal fully considered the impacts of proposed development on green space and green infrastructure in Dinas Powys?
Were alternatives considered that would reduce loss or fragmentation, and if so, why were they rejected?
5. Health & Wellbeing
Alignment with RLDP Policy SP6
The RLDP does not clearly demonstrate how proposed allocations and policies affecting Dinas Powys will achieve the health and well-being objectives set out in Policy SP6.
In particular, the Plan does not provide evidence that new development will:
• maintain or enhance access to green spaces,
• support active travel (walking, cycling, public transport), or
• deliver inclusive and safe public environments for all residents.
Without clear mechanisms to ensure these outcomes, it is unclear how the Plan will contribute to the creation of healthy, inclusive communities in line with its own strategic policy.
Question: How does the Plan ensure that proposed allocations and policies affecting Dinas Powys will deliver the health and well-being objectives set out in Policy SP6, including access to green space, active travel, and inclusive public environments?
Alignment with the Vale of Glamorgan Well-Being Plan
The RLDP does not clearly show how its proposals for Dinas Powys are consistent with the objectives of the Vale of Glamorgan Public Services Board Well-Being Plan, particularly in relation to:
• physical and mental health,
• health equity, and
• equitable access to green and recreational spaces.
There is no settlement-specific evidence demonstrating that new housing or other
allocations will support these well-being objectives, leaving a gap in the Plan's justification and effectiveness.
Question: How does the RLDP demonstrate consistency with the Vale of Glamorgan Public Services Board Well-Being Plan, particularly the objectives relating to physical and mental health, health equity, and access to green spaces in Dinas Powys?
Evidence for Health and Well-Being Outcomes
The Plan does not provide sufficient evidence that its spatial strategy, site allocations, or policies will produce measurable improvements in health outcomes for residents of Dinas Powys, particularly in areas where health needs are identified.
Without this evidence, it is impossible to determine whether the proposed development will genuinely support improved physical or mental health, reduce health inequalities, or provide accessible, high-quality spaces for recreation and social interaction.
Question: What evidence demonstrates that the Plan's spatial strategy, allocations, and policies in Dinas Powys will produce measurable improvements in health outcomes for residents, especially in areas of identified need?
Integration with the Sustainability Appraisal
The RLDP's Integrated Sustainability Appraisal (ISA) does not clearly demonstrate how health and well-being impacts have been addressed specifically for Dinas Powys.
There is limited information on:
• mitigation or enhancement measures to support healthy communities,

• the contribution of proposed allocations to active travel networks, or
• ways in which new development will improve access to green infrastructure or inclusive public spaces.
Without settlement-specific consideration, the ISA does not provide sufficient assurance that health and well-being outcomes will be achieved, nor does it demonstrate compliance with national planning policy on creating healthy and sustainable places.
Question: How has the Integrated Sustainability Appraisal addressed health and well-being impacts specifically for Dinas Powys, and what mitigation or enhancement measures are proposed to ensure alignment with national planning policy on healthy places?
6. Education & Medical Services
I believe that the RLDP is unsound in relation to education and healthcare services in Dinas Powys
Education Provision
The RLDP does not provide clear, settlement-specific evidence regarding school capacity in Dinas Powys.
My key concerns include:
• There is no demonstration that local primary and secondary schools have enough places for the children who will arise from the proposed housing.
• It is unclear whether the Plan relies on borough-wide estimates, which may overlook local pressures and result in shortages at specific schools.
• The Plan does not identify any specific improvements to school infrastructure (such as new classrooms, extensions, or new schools), nor does it set out funding, timing, or delivery mechanisms.
Without these assurances, there is no certainty that school places will be available before families move in, which could lead to overcrowding and diminished educational standards.
I am concerned that, in the absence of firm evidence and infrastructure commitments, the proposed scale of housing growth in Dinas Powys may be unsustainable and undeliverable.
Healthcare / Medical Services
The RLDP does not demonstrate that local healthcare services—including GP practices, dental services, and community health facilities—can accommodate the increased population.
My specific concerns include:
• There is no settlement-specific assessment of current or future healthcare capacity in Dinas Powys.
• The Plan does not indicate whether additional or expanded healthcare facilities will be provided, nor how this would be funded, phased, or secured alongside new housing.
• Without clear planning, the proposed growth could reduce access to essential health services for both existing and new residents, impacting physical and
mental health outcomes.
I am particularly concerned that increased demand without confirmed provision could lead to longer waiting times, reduced appointments, and pressure on local medical staff,
undermining the well-being of the community.
These gaps mean the Plan is not effective, justified, or consistent with national planning policy, which requires growth to be planned where infrastructure is available or can be secured.
7. Affordable Housing Allocation
I support the principle of providing affordable homes for local residents, especially young families, first-time buyers, and key workers who cannot afford market rates.
Well-planned affordable housing can help maintain a mixed and vibrant community and retain younger residents.
Affordable homes in Dinas Powys could reduce commuting pressures by allowing residents to live and work locally.
However, the RLDP does not provide clear evidence for how many affordable homes are needed in Dinas Powys or what types of homes are required for different groups (families, older residents, low-income households).
There is insufficient information about how and when affordable homes will actually be delivered alongside market housing.
Without clear delivery plans or safeguards, affordable homes may not remain genuinely affordable in the long term.
Concentrated or poorly planned affordable housing may put pressure on local schools, healthcare, transport, and green spaces, which are already constrained in Dinas Powys.
The Plan does not explain how affordable housing will be integrated with market housing to create sustainable, mixed communities rather than segregation or social imbalance.
Because of the lack of clear evidence, delivery mechanisms, and mitigation for potential negative impacts, I do not consider the Plan sound in terms of affordable housing in Dinas Powys.

8. Community Cohesion & Social Integration
I am concerned that the Plan, as currently drafted, does not ensure new growth will support strong, healthy, and inclusive communities.
Until the Council provides clear evidence and enforceable measures addressing community cohesion, housing mix, and health impacts, I cannot have confidence that the Plan is sustainable or fair.
Impact on Community Cohesion and Social Integration
I am concerned that the Plan does not explain how new housing and growth will integrate with existing communities.
There is a risk that rapid development could strain local services, schools, and community spaces, and make it harder for neighbours to get to know one another.
I would like to see evidence that social infrastructure will keep pace with population growth and that communities will remain inclusive and connected.
Risk of Over-Concentration of Affordable Housing
I am concerned that clusters of affordable housing in certain areas could lead to pockets of social exclusion or limit

access to opportunities.
The Plan does not explain how it will ensure a good mix of housing types and tenures across the Vale.
I ask that the Council provide evidence that housing allocations will support socially balanced, inclusive communities.
Impacts on Mental and Physical Wellbeing
I am concerned about increased traffic, air pollution, noise, and the loss of green spaces
affecting health and wellbeing. The Plan does not provide clear commitments to protect or improve accessible green spaces or safe walking and cycling routes.
I would like to see evidence that the Plan has assessed the health impacts of growth and will take steps to mitigate them.
9. Climate Change & Sustainability
I am concerned that, as drafted, the Plan does not provide enough evidence or practical measures to ensure new development is sustainable and climate resilient. The RLDP is not fully justified, effective, or consistent with national policy on climate change and sustainability.
Key gaps include alignment with carbon reduction targets, enforceable delivery of low-carbon travel, energy-efficient homes, sustainable drainage, and climate-resilient infrastructure.
Without clear policies and enforceable commitments on low-carbon travel, energy-efficient homes, sustainable drainage, and climate-resilient infrastructure, the Plan risks harming both the environment and the wellbeing of communities.
Alignment with Welsh Government's Carbon Reduction Targets
I am concerned that the Plan does not explain clearly how new homes, workplaces, and other development will help Wales meet its legally binding carbon reduction targets.
Without this, there is a risk that growth in the Vale could increase emissions rather than reduce them. I would like to see evidence showing how this (and each) new development contributes to lowering carbon emissions.
Promotion of Low-Carbon Travel, Energy-Efficient Homes, and Sustainable Drainage
I am worried that the Plan relies too much on people walking, cycling, or using public transport without clear plans to make this happen.
There is also little information on whether new homes will be energy-efficient or if systems to manage rainfall and reduce flooding (like sustainable drainage) will be properly installed and maintained.
I want to see clear, practical measures to make low-carbon travel, energy-efficient homes, and safe drainage a reality.
Resilience of Infrastructure to Extreme Weather Events
I am very concerned about the impacts of extreme weather, including flooding, heatwaves, and storms, on roads, utilities, and homes.
The Plan does not clearly show how new developments or existing infrastructure will be designed to cope with these risks.
I would like to have assurance that any buildings, roads, drainage, and community facilities will be climate-resilient and protect people's health and safety.
10. Plan-making Process & Evidence Base
In my view, the RLDP is not fully justified or effective in its current form with respect to plan-making and the evidence base. Key gaps include accessibility and transparency of evidence, consideration of resident and stakeholder feedback, and robust monitoring and review
arrangements.
Without clear and accessible evidence, demonstrated consideration of local feedback, and robust monitoring and review mechanisms, residents cannot be confident that the Plan will be fair, effective, or responsive to changing circumstances.
Clarity, Transparency, and Accessibility of Evidence
The RLDP is not always clear and is not easy to access.
Technical reports, data, and assumptions are often difficult to find or understand, making it hard for residents to see why particular sites or policies were chosen.
The Council should provide accessible summaries and clear explanations so that everyone can understand and comment on the evidence.
Local Consultation and Consideration of Resident Feedback
I am concerned that residents' views may not have been fully taken into account in shaping the Plan.
It is unclear how consultation responses have influenced allocation decisions or policy wording.
I seek assurance that feedback from local people and community groups has genuinely informed the Plan, and that future consultations will be inclusive and clearly reported.
Monitoring and Review Mechanisms
The Plan does not clearly explain how progress will be monitored or how changes will be made if things do not go as planned. For example, if housing delivery is slower than expected or infrastructure is delayed, there is little information on how allocations or policies would be adjusted.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/twp
Representation Form Annex - Redacted - https://valeofglamorgan.oc2.uk/a/twq

4623 Comment

Document Element: CC1 - Residential Operational Net Zero Carbon Development
Respondent: Mr David Barton [2683]

Summary:
Traditional Architecture has the greatest ability to combat the Climate Crisis through embodied carbon.

Full text:
Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.

TA has the greatest ability to combat the Climate Crisis through embodied carbon.

Change suggested by respondent:
-

Sound: Not specified
Attachments: None

4625 Comment

Document Element: CC1 - Residential Operational Net Zero Carbon Development
Respondent: Mr David Barton [2683]

Summary:
Fine but must harness TA with appropriate retrofitting done discreetly.

Full text:
Fine but must harness TA with appropriate retrofitting done discreetly.

Change suggested by respondent:
-

Sound: Not specified
Attachments: None

5400 Object

Document Element: CC1 - Residential Operational Net Zero Carbon Development
Respondent: Emma Reed [2653]

Summary:
Policy is pointless if the developments are located in the wrong areas as the need to travel will far outweigh any net zero houses.

Full text:
Policy is pointless if the developments are located in the wrong areas as the need to travel will far outweigh any net zero houses.

Change suggested by respondent:
Developments need to be located in the main settlements so that the need to travel is reduced for everyday activities such as going to comprehensive school/

Sound: No
Attachments: None

5712 Support

Document Element: CC1 - Residential Operational Net Zero Carbon Development

Respondent: Mr David Entwistle [3264]

Summary:

I support this policy but do question why such a long period for the initial space heating demand requirements and energy use requirements. The council should be pushing for the higher efficiency standards immediately rather than up until 2030. It feels like the council is deliberately giving housing developers an opportunity to increase profits and build cheaper less efficient housing by having these dates knowing the vast majority of new housing within the plan is likely to be delivered before 2030.

Full text:

I support this policy but do question why such a long period for the initial space heating demand requirements and energy use requirements. The council should be pushing for the higher efficiency standards immediately rather than up until 2030. It feels like the council is deliberately giving housing developers an opportunity to increase profits and build cheaper less efficient housing by having these dates knowing the vast majority of new housing within the plan is likely to be delivered before 2030.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5762 Comment

Document Element: CC1 - Residential Operational Net Zero Carbon Development

Respondent: Professor Andrew Vincent [920]

Summary:

Net zero building techniques would be a wonderful thing, but have Planning had anything but "vague promises" from Building firms? Are there statutory teeth to deal with defaulting behavior? From everything I have read recently about about such firms in the UK, compared to Europe, there can be a deep reluctance to engage in net zero building techniques. It is seen to eat into their profits. I am sure promises might be made but (as in the recent Barry waterfront developments) unfulfilled promises (and contracts) from such firms often limp along into long expensive legal cases.

Full text:

Net zero building techniques would be a wonderful thing, but have Planning had anything but "vague promises" from Building firms? Are there statutory teeth to deal with defaulting behavior? From everything I have read recently about about such firms in the UK, compared to Europe, there can be a deep reluctance to engage in net zero building techniques. It is seen to eat into their profits. I am sure promises might be made but (as in the recent Barry waterfront developments) unfulfilled promises (and contracts) from such firms often limp along into long expensive legal cases.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5874 Support

Document Element: CC1 - Residential Operational Net Zero Carbon Development

Respondent: Mr Jonathan Davies [3407]

Summary:

I fully support the ambition of VoGC to address, mitigate and adapt to anthropogenic climate change by applying demand-based metrics to reduce carbon emissions from the built environment. Monmouthshire County Council are advancing similar proposals to Inspection this summer and multiple LAs in England have successfully introduced similar targets, defining space heating demand (SHD) and energy use intensity (EUI) targets as scientifically robust metrics that align with best practice for achieving Net Zero emissions. It has been exhaustively demonstrated that better performing buildings, those with improved (reduced) SHD and EUI, more economically achieve operational Net Zero than those delivered to business as usual (BAU) and deliver considerable lifecycle cost savings for occupants. The Building Regulations methodology through the standard assessment procedure (SAP) is deeply flawed and inconsistent with efficiently or effectively achieving Net Zero (as the 2021 report for the Department for Business, Energy and Industrial Strategy "Making SAP and RdSAP 11 fit for Net Zero" concluded) and the replacement Home Energy Model (HEM) has not been demonstrated to be any better aligned. In the context of the declared Climate Emergency, action by the Senedd and Westminster is not moving fast enough to deliver our legal commitments to decarbonise.

Full text:

I fully support the ambition of VoGC to address, mitigate and adapt to anthropogenic climate change by applying demand-based metrics to reduce carbon emissions from the built environment. Monmouthshire County Council are advancing similar proposals to Inspection this summer and multiple LAs in England have successfully introduced similar targets, defining space heating demand (SHD) and energy use intensity (EUI) targets as scientifically robust metrics that align with best practice for achieving Net Zero emissions. It has been exhaustively demonstrated that better performing buildings, those with improved (reduced) SHD and EUI, more economically achieve operational Net Zero than those delivered to business as usual (BAU) and deliver considerable lifecycle cost savings for occupants. The Building Regulations methodology through the standard assessment procedure (SAP) is deeply flawed and inconsistent with efficiently or effectively achieving Net Zero (as the 2021 report for the Department for Business, Energy and Industrial Strategy "Making SAP and RdSAP 11 fit for Net Zero" concluded) and the replacement Home Energy Model (HEM) has not been demonstrated to be any better aligned. In the context of the declared Climate Emergency, action by the Senedd and Westminster is not moving fast enough to deliver our legal commitments to decarbonise.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5963 Object

Document Element: CC1 - Residential Operational Net Zero Carbon Development
Respondent: HBF (Mr Mark Harris) [538]

Summary:

Delete the policy and instead allow Building Regulations to set the way homes are constructed and their energy efficiency through Part L & F.

If the policy is not fully removed, amend it to remove the energy use intensity element.

New higher Building Regulation standards will be published before this plan's adoption, so they will apply to many of the homes delivered by the plan.

Full text:

The HBF objects to this policy, as it considers that controlling how a property is built should be achieved through Building Regulations, as it has historically been the case.

This is a position in part is supported by the Council in para 6.60 of BP42 Viability Assessment, where it states:

'As discussed in BP33A Net Zero Buildings, ... then consideration should be given to whether it remains appropriate to have a planning policy that is broadly similar, as it would be more desirable to deal with the relevant assessments through the Building Control process rather than the planning system'

Such policies are also creating inconsistent standards across LPAs, as each is choosing slightly different standards and ways to measure compliance, making it harder to deliver new homes at scale.

In particular, concern is raised about the operational element of this policy and the future monitoring. This type of assessment relies on assumptions and averages, and is likely to change over time. This makes it almost impossible to monitor or enforce, and is therefore not considered appropriate as a planning policy.

The Welsh Government recently confirmed that the new Part L & F Building Regulations will come into force in the spring/summer of 2026. This means that this higher standard will apply to the housing allocations in this plan.

HBF notes that this is an issue which has also arisen in Local Plans in England; where it appears that the Government has decided to clarify the position in its latest consultation (Dec 2025) on the NPPF, where it states:

'Streamlining local standards. - We want to promote certainty for applicants and speed up local plan production by limiting quantitative standards in development plans to only those specific issues where local variation is justified. We also want to limit duplication of matters which are covered by the Building Regulations – other than where there is the existing ability to use 'optional technical standards.'

Change suggested by respondent:

Delete or amend the policy in accordance with the comments above.

Sound: Yes
Attachments: None

6047 Object

Document Element: CC1 - Residential Operational Net Zero Carbon Development
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:

Policy CC1 requires an Energy Report at outline planning stage. It would not be possible to provide all of the information required to demonstrate compliance with Policy CC1 at the outline planning application stage and that the information requirements for Policy CC1 can only be expected to be provided at detailed application stage. Space heating demand should remain within Building Regulations, not local policy, to avoid inconsistency. Clarification is needed on measurement points and whether Policy CC1 applies only to regulated energy use. Flexibility should be included if Building Regulations change. Impact on development viability, including AH must be assessed.

Full text:

As an industry leader in delivering high quality and energy efficient homes, BDWR is supportive of the overall aspirations of Policy CC1. However, it is observed that the wording of Policy CC1 requires all proposals for one or more new dwellings to demonstrate policy compliance through an Energy Report. It is considered that it would not be possible to provide all of the information required to demonstrate compliance with Policy CC1 at the outline planning application stage and that the information requirements for Policy CC1 can only be expected to be provided at detailed (reserved matters/full) planning application stage.

Welsh Government consulted on changes Building Regulation relating to Part L (Conservation of Fuel and Power), Part O (Overheating) and Part F (Ventilation) for dwellings and non-domestic buildings in August 2025. It is considered that space heating demand should remain within the remit of Building Regulations control as additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy and legislation.

In addition, there needs to be clarity on where the measurement point begins (for example, if the guidance were to require developers to take the heating demand before the efficiency of an air source heat pump is factored into the heating load, then the efficiency of the heating pump could not be included in the calculation of demand). Policy CC1 should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This would also ensure consistency with Building Regulations methodology.

Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.

Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.

Change suggested by respondent:

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

As such, Policy CC1 should be amended as follows to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness:

"Proposals for one or more new dwellings will be required to achieve net-zero carbon operational emissions by:
1 Following the principles of the Energy Hierarchy for Planning, prioritising a reduction in energy demand and improved energy efficiency.
2 Achieving the following standards in individual dwellings as calculated using an identified energy performance model:
Developments that secure planning permission from RLDP adoption to 31st March 2030
iii. Space heating demand less than or equal to 40kWh/m2/year;
iv. Energy use intensity less than or equal to 75kWh/m2/year;

and developments that secure planning permission from 1st April 2030 onwards
iii. Space heating demand less than or equal to 15kWh/m2/year;
iv. Energy use intensity less than or equal to 40kWh/m2/year; and

3 Providing on-site renewable electricity generation with an output equivalent to at least the annual energy consumption of the development, as calculated using an energy performance model

Where the use of onsite renewable energy generation to match total energy consumption is demonstrated to not be technically feasible the following hierarchy should be followed:
• Renewable energy generation should be maximised as much as possible; and/or
• Connection made to an existing or proposed low carbon district energy network (in compliance with Policy sp1); or
• Where this is not possible the residual energy (the amount by which total energy demand exceeds the renewable energy generation) is to be offset by a contribution to the Council's Project Zero fund as far as economic viability allows.

Compliance will be evidenced within an Energy Report."

Sound: No

Attachments: None

6080 Object

Document Element: CC1 - Residential Operational Net Zero Carbon Development

Respondent: Barratt Redrow Homes [2669]

Agent: Lichfields

Summary:

Policy CC1 requires an Energy Report at outline planning stage. It would not be possible to provide all of the information required to demonstrate compliance with Policy CC1 at the outline planning application stage and that the information requirements for Policy CC1 can only be expected to be provided at detailed application stage. Space heating demand should remain within Building Regulations, not local policy, to avoid inconsistency. Clarification is needed on measurement points and whether Policy CC1 applies only to regulated energy use. Flexibility should be included if Building Regulations change. Impact on development viability, including AH must be assessed.

Full text:

As an industry leader in delivering high quality and energy efficient homes, BDWR is supportive of the overall aspirations of Policy CC1. However, it is observed that the wording of Policy CC1 requires all proposals for one or more new dwellings to demonstrate policy compliance through an Energy Report. It is considered that it would not be possible to provide all of the information required to demonstrate compliance with Policy CC1 at the outline planning application stage and that the information requirements for Policy CC1 can only be expected to be provided at detailed (reserved matters/full) planning application stage.

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In addition, there needs to be clarity on where the measurement point begins (for example, if the guidance were to require developers to take the heating demand before the efficiency of an air source heat pump is factored into the heating load, then the efficiency of the heating pump could not be included in the calculation of demand). Policy CC1 should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This would also ensure consistency with Building Regulations methodology.

Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.

Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.

Change suggested by respondent:

As such, Policy CC1 should be amended as follows to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness:

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1 Following the principles of the Energy Hierarchy for Planning, prioritising a reduction in energy demand and improved energy efficiency.
2 Achieving the following standards in individual dwellings as calculated using an identified energy performance model:
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and developments that secure planning permission from 1st April 2030 onwards
iii. Space heating demand less than or equal to 15kWh/m2/year;
iv. Energy use intensity less than or equal to 40kWh/m2/year; and

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• Connection made to an existing or proposed low carbon district energy network (in compliance with Policy sp1); or
• Where this is not possible the residual energy (the amount by which total energy demand exceeds the renewable energy generation) is to be offset by a contribution to the Council's Project Zero fund as far as economic viability allows.

Compliance will be evidenced within an Energy Report."

Sound: No

Attachments: None

6600 Comment

Document Element: CC1 - Residential Operational Net Zero Carbon Development

Respondent: Mr David Barton [2683]

Summary:

Embodied energy and embodied carbon- must remain a central priority and so influence new construction to readopt Traditional Architecture principles as this will be pivotal towards the area's future green credentials as outlined in many existing auxiliary planning documents approved presently with Carbon Studies taken of existing architecture, notably buildings saved from demolition.

Full text:

Context:
This consultation feedback submission has been produced by Mr. David Richard Barton, also known as Community Campaigner David Barton who is promoting both the existing Built Historic Environment and Traditional Vernacular Architecture (TVA)/ Traditional Architecture (TA) as a key feature across UK and Ireland-wide Local Authorities and associated Planning Departments at all tiers of Local, Regional and Central Government.
This universal consultation therefore acts as an official Representation at all and any stage of official area UK Planning Consultations- Preliminary Scoping Documents, Named Stages of the Local Plan, Conservation Area Appraisals and Supplementary Planning Documents (SPDs), primarily regarding Design Codes.
Representations are being made by Mr. Barton as part of his ongoing work to champion the key stakeholders at various key areas old and new with a view to supporting their economic growth through the merits of High-Quality style Conservation with the hope of encouraging wider constructive and restorative support through positive and constructive working.
It is submitted that TVA should play a key part in any and all policy moving forwards on the grounds of conferring practical benefits be these periodic maintenance, their perceived support from the public, their invaluable contribution to achieving Climate Crisis Targets set local, nationally and internationally alongside their overall cost-effectiveness to key stakeholders alike in terms of Planning and sourcing of raw materials.
*One primary document that should be considered with significance especially alongside my own representation is a written academic account of the actual practicalities associated with Traditional Architecture from a leading expert in their field.i.) Not only does this in-depth analysis provide an in-depth take on the widely assorted merits of this type of Architecture but it fully corroborates my case made across all sections typically found in one of the consultations highlighted above.
Furthermore, my representations to date and contained herein this document are duly supported by the Founder and Director of The Institute for Traditional Architectureii.) who has identified and recognised my own contribution(s) to communities up and down the Sefton Borough. This is an internationally acclaimed organisation which periodically works with other leading agencies and organisations to bring about effective positive change.
Outlined throughout Submission are responses to existing Consultations which set out why I consider amendments to

existing Planning Policy documents are necessary to ensure the best possible outcomes.
References to supporting documents are contained in the indented blue numbering.
This Submission has been prepared for UK and Ireland-wide Local Authorities in the hope that it may serve as an umbrella representation by Mr. Barton. This does not prejudice his ability to also comment on live stages of any one Consultation, merely providing the ability to be put in touch directly with any one Local Authority in receipt of this Representation with the prospect of also taking part in any version(s) of Consultations begin ran by said Local Authorities. If there are future consultations, especially regarding Design Codes and SPDs relating to this across both designated and non-designated heritage assets then it is hoped that these are duly provided to Community Campaigner David Barton.
Mr. Barton has cited material references and sources from his previous Representation to the Bootle Area Action Plan Consultation (2021-2026) that align with his existing and ongoing points which he would like to raise in parallel with other Local Authorities. Where a more detailed discussion with leading sources, such as Architects and Academics may prove conducive with these Councils then Mr. Barton would be delighted to discuss this further.
Community Campaigner David Barton:
Community Campaigner David Barton is a Heritage Campaigner of over 11 years' experience who has championed and led a number of successful campaigns to promote TVA in modern-day life. His dual mandate is to provide effective (alternative) use of historical buildings encompassing a full restoration alongside achieving the mainstream construction of new classical architecture on numerous economic, environmental and ecological grounds that align with existing policy set out by Central Government covering the UK and increasingly elsewhere across the world.
Having worked with a wide array of residents, businesses and organisations in that time, which has included the full restoration of the Victorian Verandahs on Lord Street, Southport in tandem with the respective key stakeholders and other property owners to prevent demolition of Old Builds across Sefton, Mr. Barton is now hoping to make the process of utilising the built environment to its fullest potential a far simpler one that will enable Bootle to fully reach its maximum potential as a historic town.
SECTION 1: Design Codes:-
1. Design Codes based on TVA should be utilised in preference to Design Guides
2. LAs should establish recurring partnerships with key Consultation Bodies, such as Create Streets and The King's Foundation, etc who specialise in getting through to a huge swathe of grassroots members of the public with tried and tested previous experience in Local Plans, such as Lichfield, etc.
3. Non-demolition of historic buildings prior to the 1950s must be made policy or adhered to as part of LCC's commitment to combatting the Climate Crisis through sequestering carbon in its Old Builds.
4. LAs should adopt a Local List of Valued Buildings (Non-designated Heritage Assets), which have been a Government requirement since the policy introduction through the NPPF in 2012. Historic England produced a guide to help Councils in May 2012. Bristol produced an exemplar list in 2015, which is well worth reviewing.
5. Existing Action Plan if present for Designated and Non-designated Heritage Assets needs identifying and/ or establishing (I may support this if invited).
6. Option for people to provide feedback even if out of time for additional documents, such as SPDs or at the discretion of Councils where feedback may be particularly assistive or lead to additional academic and architect guidance. Option for public publishing of feedback should be encouraged with the consultee's consent to encourage wider consultation uptake moving forwards.
7. Era-style Buildings, especially rows of Georgian, Victorian and Edwardian architecture must be faithfully restored, retained and recreated to complement surrounding historic streets that may or may not be classed in official Conservation Areas preventing harsh contrast with newer built housing estates from the 1950s onwards.
8. Where demolition is proposed for 1950s style housing onwards- any new construction must be in the historic building style and local materials to ensure high carbon capacity, quality aesthetic and true blending of the interconnected conurbations of any one area, place or location.
9. Concerted efforts to identify and locate core suppliers for raw materials and specific heritage skills should encourage new uptake of these limited artisan craft skills by new contractors locally based to support the local economy, provide employment, and reduce the cost of product and service in the long-term.
10. Volunteer labouring assemblies should be fully encouraged and supported identifying key individual an group skillsets that can be utilised to protect historic buildings or areas at risk with a view to supporting the construction of new authentic style housing (as and where appropriate) and the reconstruction of demolished prized old buildings beloved by the community, such as community pubs, libraries and community centres.
11. Simplified streamlined Planning Process for key stakeholders either working to authentically restore buildings and/ or build new ones, such as observed with many civic buildings in Budapest Hungary and the Federal University Buildings in the US.
12. Where there have been evolving building styles over years, eg. Combination of one or more: Georgian, Edwardian and Victorian, the style that best promotes the area, ie. One that has the majority era structures left or capacity size requirements as examples should be utilised by house builders, especially where a streetscape may have been annihilated during the World Wars.
SECTION 2: Designated & Non-Designated Heritage Assets:
1. Enhancement of Historic Areas to remove modern street furniture with the integration of classical style timepieces should be encouraged and pursued wherever possible with clear preferred guides set out for each part of the City.
2. Enhancement of Setting with funding grants and financial incentives from all tiers of Government for Private Investors especially those contributing actively towards achieving Net Zero through Embodied Energy/ Carbon Capacity rich measures, i.e. Retention of Old Builds.
3. Archive Pooling of invaluable source material, such as Historic Photographs, Oil Paintings, such as "Memory Lane" featured on InYourArea Magazine to enrich existing material archives.

4. New officialising of Non-Designated Heritage Assets must be actively supported even if informed by the (wider) community thereby providing some possibility of removing these from risk of demolition.
5. Incentives must be provided to those dependable sincere third party investors that take on, maintain and protect said sites against their annihilation from the streetscape with rescue-packages actively promoted and supported once again with a trusted Directory creating goodwill amongst the local community.
6. Opportunity to meet or correspond on Zoom Conference Call regarding key areas, buildings and places at risk where key stakeholders, such as property owners may be better placed to engage in positive and constructive discussion through third parties, such as myself and a trusted panel of experts in their fields and sectors who could enable these people and organisations to maximise their civic heritage, whilst proactively striving to protect more historic buildings from decline and/ or demolition where a strategy package for raising the revenue to do this could be arranged and facilitated.
7. Defining Character Areas- zoning symmetrical parallel construction recommended where distinctive individualised properties remain as checked against authentic archive blueprints. This will ensure high-quality housing for everyone reducing the societal divides between misperceived “good areas” where affluent people reside in historical style properties and less advantaged reside in contemporary ones.
8. Industry should be conserved at former industrial complexes, such as Economic Docks with equivalent sites offering modern-day uses, alongside traditional uses such as export and import of raw materials at places such as Docks and Port encompassing: ICT sector, Green Research & Development, etc.
9. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of long-beloved buildings, especially those with demonstrable evidence of Holy Worship.
10. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of landmark buildings, especially those with key links to an area’s founding or history locally.
11. All Powers to monitor, collaborate with existing and/ or new property owners to conserve these buildings should become mandatory with appointed Community Champions for Civic Heritage that area direct link between Local Authorities and said wider key stakeholders to prevent demolition of structures that may be at risk of destruction from vandalism, urban exploration and demolition.
12. Reconstruction Programme harnessing existing limited crafts people’s skillsets to be used as a fundraising vehicle to bring back buildings that may have been demolished to dissuade future demolition as a choice by property owners and by means of expanding these otherwise lost skillsets that are at live risk of becoming extinct from the UK.
13. Checklist of buildings at high risk must be expanded beyond the existing groups and organisations that are saturated with high caseloads, such as SAVE Britain’s Heritage, etc so that dialogue channels can be created and fostered between Community Champions for Civic Heritage.
14. Bespoke-tailored funding packages for Properties at Risk of decline or demolition should be integrated with Local, Regional and Central Government-funding as a means of regional economic output through the return on investment that may support other key grant funding capital infrastructure projects, such as transportation and drainage improvements.
SECTION 3: Conservation Areas:-
1. Alterations for Listed Building Consent must be simplified with additional streamlined testing methodologies, such as proof of legitimate third party support, such as correspondence chains between applicant and Groups, such as The Victorian Society that can assist LAs complete workload much sooner allowing more attention for challenging cases, such as Non-Designated Heritage Assets at live or upcoming risk of demolition by Housebuilders, etc.
2. Highways & Street Furniture should be duly supported across the whole of an area to enhance its historic appeal to the commercial community as much to its indigenous community; as this is supported greatly in equivalent Public Realm Strategy SPDs- where any and all guidance and support must and should be provided, with key at risk projects being an exceptional anecdote that may be cited in future documents or versions of this and other consultations to stimulate economic construction and restoration across other designated Conservation Areas, etc or otherwise.
3. Provide incentives for the return of lost adornments and decorative features, such as roof fixtures like Chimney Stacks once again with an approved contractor directory to make Old Builds practical to own, live and work in the 2020s onwards. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.
4. Permissions for authentic replica and more durable materials, such as reproduction sash windows must be supported to prevent exorbitant high costs through procuring these, limited longevity and economic climates being unstable. This must be assessed on a case by case basis.
5. No more deliberate manipulation and selective misinterpretation of using contemporary modern designs using old-style fabric raw materials, such as stone cladding for new housing where the design and shape clearly undermine the concept of blending within or around a Conservation Area.
6. Compendium of approved and recognised TVA Architects based across the UK with a view to supporting the training in time of more Northern counterparts to reduce cost associated with travel expenses, etc. This will actively reduce the level of demolition applications countering the purpose of this SPD and other live Policy. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.
7. New Conservation Areas should be established covering areas of surviving built historic environment to positively reverse fascia changes to more modern ones.
8. Blue Plaques should be fully supported across as many different Conurbations, especially if Applicants reach out for endorsements.
9. Discretionary Rate Relief should be provided to those proactively support LAs with conserving their respective Conservation Areas through their own resources, skillsets and time as an incentive to others to work alongside the Council positively and constructively.
10. Where long-lost prized buildings are reconstructed whether based in a Conservation Area or not this should confer

discretionary financial support, e.g. Rate Relief for the length of time taken to produce this outcome acknowledging the embodied carbon now contributing positively towards the LA's Climate Change Action Plan Targets.
11. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with collaborate fundraising models utilised from key stakeholders, such as property owners, undisclosed third party investors, Residents' Groups, etc.
12. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with authentic identical reproductions permitted where all options to secure finance have been fully exhausted and/or the existing streetscape is at imminent risk of receiving contemporary replacement street furniture on health and safety grounds, eg. Lap Posts.
SECTION 4: Climate Change:-
1. Pleased to note that LAs broadly acknowledge and grasp this concept therefore the aim should be to increase the net number of carbon-rich Old Builds long-term through support packages that will combat the Climate Crisis, provide economic benefit and improve Conservation in a pioneering fashion that may draw wider funding opportunities for the area.
2. Retrofit Ventilation is a key point that should warrant future new construction utilising higher ceilings through the reconstruction of Old Builds outfitted for the modern day with retrofitted energy supplies, etc that will also serve to break down societal dives regarding perceived good and bad areas where streetscapes are harmonious yet distinctly unique in beauty like any one Conservation Area.
3. Embodied energy and embodied carbon- must remain a central priority and so influence new construction to readopt TVA principles as this will be pivotal towards the area's future green credentials as outlined in many existing auxiliary planning documents approved presently with Carbon Studies taken of existing architecture, notably buildings saved from demolition.
4. A brick by brick case study of as many buildings as possible may warrant invitation of national and international academic institutions to undertake a regional or national Carbon Study further justifying the retention of prized Old Builds elsewhere across the area, region and the UK.
5. Sustainable Materials- an approved contractor directory that could readily advise and source the necessary raw materials with realistically reduced costs substantially again deterring potential demolition-driven applicants from consuming workload time of the Planning Department. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of sustainable materials must be provided by the Local Council.
6. Biodiversity- maximise greenery along all arterial roads ad commuter routes with dense tree planting and the introduction of hedgerows and wherever possible financial incentives to get more private property owners on side.
7. Flooding Defences- existing and prospective hotspot areas should be clearly identified for emergency grant funding whereby Local Authorities, especially across a region may agree with the respective Government Department to distribute emergency flooding to prevent costly consequential recurrent repairs.
8. Transportation using arterial roads and commuter routes (Motorways and Railways) should prioritise linking each end of a Local Government sphere with the surrounding Local Government spheres, such as Southport at the very northern tip of Merseyside where transportation links are much weaker with Lancashire in the north and east than with the rest of Merseyside to the south.
9. Coastlines should be reclassified as SSSIs, especially where the economic potential is not being fully realised, such as Coastal Towns with underused Beaches, such as Southport in Sefton as one example for other LAs.
10. Financial Incentives for the demolition of Carbon-poor Glass Towers and contemporary construction should be utilised to restore the skylines across any one area whilst providing better mathematical application of the space for residential and commercial use, such as larger tenement buildings or the original streetscape reinstated yet designated specifically for housing where there may be a deficit.
SECTION 5: Historic Buildings:-
1. Create a Designated AND a Non-Designated Heritage Asset List, such as AHV whereby existing buildings and those that may yet return can be logged and recorded to combat the Climate Crisis whilst making heritage work for LAs in modern day with attractive locations timeless for everyone to appreciate enhancing the investor appeal, all-round interest and acknowledging the industrial pioneering legacy of the City.
2. Clearance of vegetation along the Railway Lines alongside other equivalent parts of the Line to eradicate the perceived neglected aesthetic.
3. Exception Areas, such as those at risk or recently restored have the real potential for wider grant funding for ambitious projects out of the realm necessarily of undisclosed third party investors supporting Property Owners, therefore all and any support in reaching these person(s) will greatly contribute to all possible tangible success in the interim period.
4. Providing key guidance, such as agreed in-keeping historic street furniture, such as Cast Iron Lamp Posts, Bins, Planters approved upon inspection of historic photographs, agreed installation and where appropriate maintenance by the LA will ensure the iterative success of this transferring to other Conservation Areas, etc.
5. Scheme to rebuild and reconstruct long-lost buildings, prioritising vacant sites that could adapt some mixed use with residential accommodation and commercial application thereby supporting Climate Action, creating employment and recordable success through placing of necessary economic drivers, such as offices for Technology Sector if original use cannot be sourced in sufficient time simultaneously meeting housing targets.
6. Archive Blueprints for historic conurbations that have suffered architecturally over time through building conversions, demolitions, etc should be provided to key stakeholders, if necessary with a printing charge available for official spiral hard copy version to view detailed historic plans covering layouts, etc.
7. Those people and organisations that have either/ both maintained their properties well over the years or may wish to provide additional support to others, such as restorative support, archive blueprint guidance, etc should be eligible for discretionary reductions by the Council across various property taxes where they may be suffering hardship or through

personal circumstances.
8. “Newer” style housing with true authentic rhythm, such as Suburban style faux Tudor fascia frontages with red clay tile pitched roofs and terracotta design windows (tile hung walls) are a good compromise whereupon finance and scheduling may otherwise adversely impact on housing settlements.
9. Fascia Frontage details should be reinstated whether in a Conservation Area or not, especially where approval has been granted to rebuild an entire house using breeze block to produce a stereotypical black, white and grey dwelling out of place.
10. LAs should work closely with Foundries to procure raw materials and building services in the event of harnessing their own Contractor Firm(s) in-house that could work cross-authority to make net savings whilst ensuring particular new housing neighbourhoods conform to an appropriate style.
11. Modern “Carbuncle” extensions should not be permitted at any one area- instead an authentic style addition may be used to retain blending.
12. Discretionary financial support packages to assist House Builders choosing the traditional vernacular route should be considered and utilised where it can be proven that this third party will restore the historic streetscape yet making it applicable or modern day requirements- residential or commercial. This may be especially so where they are able to help others prevent the demolition of a prized Old Build built before the 1950s.
SECTION 6: Traditional Vernacular Architecture:-
1. Provide a directory of approved and trusted Conservation Specialist Contractors- this will be key for repairs and maintenance reducing costs for all parties, expediting the physical process of regeneration and smoothen planning work schedules so that finer detail may be considered on priority cases or those that may be at risk of consequential repair, such as Places of Worship and detached Buildings with flat roofs, etc at higher risk of damage than customary dwellings.
2. These same people should be readily contactable for new construction
3. Encourage smart building methods and use of TVA as meticulously explained in this SPD outlining “Breathing” Solid Wall Construction using older style materials thereby reducing maintenance cost which combined with the approved contractor directory will further drive down costs, time and effort for everyone.
4. Alterations- must introduce a simplified listed building consent form and application process that is streamlined encouraging better maintenance of Old Builds and reducing the rising propensity of builders to allow buildings to deteriorate, such as the Historic Pub that had to be rebuilt in Kilburn, London post 2015.
5. Provide specialist Heritage Arts & Craft Skills Programmes that anyone can learn and use so that these high cost tasks can eventually stabilise in price making them more affordable and available to those that don’t have the time to do this themselves or may be risk averse even.
6. Extensions- there must be a proactive emphasis on in-keeping structural fabric to prevent future errors, such as the Municipal Building depicted in the SPD being replicated again thereby harming the Conservation value.
7. New Housing Estates should adopt historical archival blueprints, ie. A Georgian, Victorian or Edwardian layout with the likeliest period architecture utilised where this area remained greenbelt until the 1950s.
8. Area Expansion of housing must revert to traditional timeless designs that confer many practical advantages over modern styles that are harder to maintain are timeless with regard to dating and ensure a more evenly distributed community atmosphere in the long-term future.
9. Infrastructure should be appropriately considered for existing and new areas so that no one area is at risk of becoming congested through traffic for a particular commodity, such as Schools, Doctor Practice, Dental Practice, etc.
10. Site Layouts should complement the historic layout with a view to Post 1950s contemporary Architecture out of place being one day demolished to reinstate Long-lost beloved buildings from before the World Wars that could blossom economically today.
11. Building Form shouldn’t permit for dated modern structures that delineate and essentially divide communities between the old and new parts of any one location.
12. Façade Design mustn’t be compromised for contemporary architecture, especially in view of coveted Heritage Status for any one area being at risk of being lost if said contemporary architecture is pursued.
SECTION 7: Making an application:-
1. Identify recurring applicants that are harming civic heritage, be this across Conservation Areas, Non-designated heritage assets or elsewhere with experience of demolition to date- this should be considered before granting permission to apply or acquire planning approval.
2. Enforcement Penalties for key stakeholders that purposely allow their properties to fall into decline and hoped eventual demolition through this tactic, which is more prevalent since 2020.
3. Create an Action Plan to deter persons or organisations from pursuing demolition, such as financial incentives, sincere investor network directory set by Central Government to offload for profit and enforced Design Codes that cannot be manipulated through semantics like Design Guides in isolation as has happened elsewhere. This must be kept for emergency instances where there is an expected threat of decline or demolition.
4. Agreed that temporary alteration of heritage sites, such as stairs or ramps for wheelchairs should be utilised to prevent deleterious loss of historic surroundings and features alike.
5. Full Pre-Consultation publicised and utilised to ensure appropriate Design Codes for new housing alongside positioning and layout in case volunteer assemblies may assist property owners with restoration of historic buildings.
6. Brick by brick Analysis undertaken of projects set for Traditional reconstruction so that these statistics may provide both the Council with evidence for green grant funding support for other key infrastructure projects, such as Transportation and
Drainage Defences and property owners may incur a discretionary reduction in associated reconstruction costs of heritage buildings and vistas.
7. Ability to lock feedback in for Consultation automatically unless the council can alert interested consultees in taking

part again whether they are locally, regionally or nationally based.
8. Special partnerships with Property Owners of historic buildings at risk of decline/ demolition to discreetly support them with the option to publicise this accordingly to reach out to others in the same position to secure alternative use for these structures as opposed to demolition.
9. Proactive effort to stop Breaking and Entering style of “Urban Explorers” who are coincidentally apparent whenever demolition is scheduled for buildings especially since 2020.
10. LAs to proactively work closely alongside Community Champions and other leading Heritage Groups, such as English Heritage giving these organisations a voice on the frontlines, especially where so many buildings are presently being overlooked for additional guidance and/ or support due to cost and time restraints facing these same groups and organisations (including the LA).
SECTION 8: MISCELLAENOUS:-
1. Provide all possible support for the reconstruction of Old Builds as is happening elsewhere across Europe, especially Budapest, Hungary, North America, etc to significantly increase Embodied Energy/ Carbon storage.
2. Establish a Plan to adopt Unadopted Roads or supply key services, such as carriageway resurfacing as disabled access and entry/ exit of Emergency Vehicles is presently a cause for concern.
3. Provide Pre-Approval and agreement of specialist Conservation Area style Historic Street Furniture, such as Cast Iron Lamp Posts, Bins and Planters for this prime Conservation Area including installation, maintenance costs (where appropriate).
4. Provide full access to the Archive Resources (at no/minimal cost) as an invaluable incentive for existing and parallel undisclosed third Party Investors. Discretionary waivers may be appropriate for those third parties proactively working to prevent decline and demolition of historic buildings.
5. Car Parking on and off street should be supported to ensure freedom of choice for everyone, accessibility and connectedness.
6. Car Parking abodes should be tastefully designed like modern-day stables for vehicles that are in-keeping with the built historic environment.
7. Provide publicly published names of consultees willing to work alongside the Local authority and other key stakeholders, such as property owners and undisclosed third party investors, etc.
8. Provide select tours for prospective investors and housebuilders of existing traditional architecture where Design Codes of this identical style would complement both old and new architecture bending the area better more cohesively, eg. the form and layout of Oxford City Centre which has changed minimally structurally since the 1800s.
9. Provide a focused effort on utilising people’s skillsets on a meritocratic basis, ie. Procure specialists and volunteers that could work together on key emergency projects, such as Historic buildings at risk without layered bureaucracy on achieving positive outcomes, such as Community Assets where deadlines can be thwarted by separate third parties.
10. Create a Top Ten Historic Buildings at Risk Register where appropriate conditions, such as security against Urban Exploration, etc can be utilised safeguarding these structures, providing the respective property owners peace of mind whilst actual scope for revitalising these for solid economic gain.
11. Infrastructure assessments should be fully outlined, such as Air Quality risk from new construction at presently congested areas, hence the case for Traditional Architecture that will confer longevity benefits in the long-term with as much free car parking as possible.
12. Free Car Parking may be monitored through expected proof of purchase when visiting, eg. minimal £1.00 at a shop encouraging partnerships between private businesses and LAs.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation - https://valeofglamorgan.oc2.uk/a/33d

6712 Object

Document Element: CC1 - Residential Operational Net Zero Carbon Development

Respondent: Persimmon Homes (East Wales) [1068]

Agent: Asbri Planning

Summary:

Policy CC1 – Residential Operational Net Zero Carbon Development

Persimmon Homes has significant concerns regarding Policy CC1 and objects to it on the basis that it replicates requirements already being progressed at a national level through Welsh Government's Future Homes Standard (FHS). The FHS is intended to deliver "zero carbon ready" homes via a unified Building Regulations framework, making additional local policy unnecessary. At present, Building Regulations Part L1A sets out the standards for energy efficiency in new dwellings, and Persimmon already designs its homes to go beyond these minimum thresholds. This includes enhanced insulation
and improved building fabric performance, with reduced U values for elements such as walls, roofs, floors and windows to minimise heat loss. As a result, our homes typically achieve strong Energy Performance Certificate (EPC) ratings, generally in the A–B categories.

Introducing further operational net zero requirements at a local planning level risks adding cost, complexity and uncertainty, potentially affecting the viability and deliverability of housing sites. The Development Plans Manual for Wales is clear that local plans should not repeat national policy or seek to regulate matters already addressed through other statutory regimes. On that basis, Policy CC1 is not considered to be justified and is inconsistent with the second test of soundness.

The proposed shift in standards from April 2030 represents a substantial and abrupt escalation in expectations. Although the policy refers to schemes such as Tai ar y Cyd and AECB CarbonLite, these examples largely relate to grant funded affordable housing projects. There is no robust evidence that equivalent standards can be met on mainstream housing sites without undermining overall viability. The Development Plans Manual requires policies to be based on strong evidence and to be realistically deliverable across the plan period. Without this, there is a risk that the proposed policy could impede
housing delivery and compromise the RLDP's ability to meet identified needs.

Policy CC1 could also lead to inconsistent energy performance requirements across Local Planning Authorities in Wales, contradicting the advantages of a unified regulatory system via Building Regulations. For volume housebuilders working across several authority areas, this would introduce unnecessary variation and complication. The DPM highlights the importance of policies that support
housing delivery and avoid avoidable burdens. By introducing bespoke modelling thresholds and operational monitoring requirements, CC1 risks blurring the line between planning and Building Control, raising questions about the policy's justification and practical application.

It is Persimmon's view that Policy CC1 is premature and that it is more appropriate for such matters to be addressed through building control rather than planning policy. In its current form, the policy risks impacting housing supply, affordable housing delivery and overall implementation across the plan period. For these reasons, we consider that Policy CC1 fails to satisfy the relevant tests of soundness and should be removed from the emerging RLDP.

Full text:

We write specifically with regard to the Key Site at 'North West Barry' (Policy SP4: KS1). As the Authority are aware, a significant amount of supporting information has been prepared in relation to the Key Site over the course of the preparation of the Replacement LDP to date – this detailed evidence has clearly demonstrated that the inclusion of 'North West Barry' as a Key Site with the Replacement Plan fully accords with the Replacement LDP strategy. Furthermore, the detailed submissions have evidenced that the site is entirely deliverable and viable.

In summary, this representation sets out support for the inclusion of Land at North West Barry as a Key Site within the Replacement LDP. Our Client (Persimmon Homes) is fully committed to the delivery of the allocation, in accordance with the policies of the Replacement Plan (both site-specific and plan-wide policies inclusive).

We would highlight that although the representation provides overarching support for the Deposit Plan (and the inclusion of North West Barry as a Key Site), a number of detailed objections are submitted in relation to specific elements of the proposed wording of the Key Site policy (HG1: KS1). In addition, the wider policies of the Deposit Plan have been reviewed in detail and comments are submitted accordingly.

Background

By way of background context, as the Authority are aware, a Candidate Site representation was submitted on behalf of Persimmon Homes in relation to Land at Weycock Cross, Barry, at the Stage 1 Call for Sites in September 2022 (Site Ref. 449). The land (circa 7 hectares) was put forward for inclusion in the Replacement LDP for a housing allocation (for circa 180 units). Within the Replacement LDP Preferred Strategy (published November 2023), the Candidate Site at Weycock Cross was not identified as a Key Site, in light of the preferred allocation of 1,500 units at land at North East Barry. Further to issues arising in relation to the deliverability of the North East Barry Key Site, the Authority subsequently consulted on alternative options for the provision of sufficient housing land within Barry, with the Candidate Site at Weycock Cross ('North West Barry') identified as capable of delivering 376 units (as taken forward within the Deposit Plan). A significant degree of supporting survey and assessment work has been prepared in relation to the North West Barry Key Site which serves to demonstrate that the site (at a capacity of 376 units) presents a sustainable, deliverable and viable allocation, capable of accordance with national sustainable placemaking outcomes.

Sustainable Growth Strategy (Policy SP1)
The Deposit Plan's overarching strategy in relation to sustainable growth is supported. The primary focus of concentrating housing growth within the 'Strategic Growth Area' (i.e. where the main centres of population are accommodated, and which are served by a range of facilities and services, and are accessible by a range of transport modes) as outlined by Policy SP1 is considered appropriate and will allow for the delivery of sustainable and resilient communities. As per previous representations
submitted by Asbri Planning on behalf of Persimmon Homes in relation to the RLDP Preferred Strategy,
the prior identification of the strategic-scale (1,500 unit) Key Site at North East Barry was considered to represent an over-reliance on one site to meet the housing demand of the Authority's Key Settlement (with associated constraints in relation to the delivery of units on a strategic-scale site within the earlymid part of the plan period). It is considered that the inclusion of North West Barry as a Key Site, supplemented by a number of smaller housing allocations as identified in Policy HG1, will ensure that the housing requirement for the Barry can be met in a robust and deliverable manner.

Overall Growth Levels (Policy SP6)
It is acknowledged that the preferred growth option (dwelling-led 10 Year scenario), upon which the
RLDP housing requirement figure is based, reflects what has been delivered in the Authority in recent years, and is considered by the Authority to be realistic and suitably ambitious given the Vale's position within the National Growth Area. However, as a general comment, it is considered that targeting a higher/more ambitious growth rate would be appropriate. In reviewing the most recent LDP Annual Monitoring Report (Vale of Glamorgan LDP 2011-2026, 7th Annual Monitoring Report, 1st April 2024
31st March 2025) (published October 2025), it is clear that there is a shortfall in housing delivery in the Vale of Glamorgan. It is stated that: "Between 1st April 2011 and 1st April 2025, a total of 6,999 dwellings were completed within the Vale of Glamorgan of which 4,641 units were general market dwellings against the 2025 AMR target of 6,387 that should have been developed at this point in the plan period, in accordance with the target. The number of additional general market dwellings delivered is 27.3% below the monitoring target".

In light of the fact that there is a significant shortfall in housing delivery (i.e. currently 27.3% lower than the LDP target), it is considered that a higher growth level for the
Replacement Plan period would assist in rectifying under-delivery, allowing for housing completions to be better aligned with evidence of need (rather than repeating past shortfalls).

On February 12th 2026, the Welsh Government published updated estimates of additional housing need in Wales. The figures replace the 2019-based estimates and draw on the latest available data, including the 2022-based household projections published in late 2025. In summary, Welsh Government identify that there is a current estimated existing unmet need of 9,400 housing units. Estimates of existing unmet need have increased by 64% since the 2019-based estimates, due to a rise in homeless households in temporary accommodation.

In terms of future housing need, on average, between 7,800 and 9,300 additional housing units are estimated to be needed annually over the five-year period from July 2025 to June 2030, with a central estimate of 8,700 from newly arising need. The estimated newly arising need for July 2025 to June 2030 is higher than in the 2019-based estimates. This increase reflects higher projected household growth in the 2022-based household projections compared with the 2018-based projections used previously. The Authority will need to give detailed consideration to the implications of the updated estimates of housing need. As the most up to date projections, the Replacement LDP must properly account for the
new dataset to ensure soundness of the plan. In this regard, it is stated at Paragraph 5.34 of the Development Plans Manual that "In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base."

Accordingly, Paragraph 5.35 goes on to state that "All LPAs should use these projections and the resultant household numbers when considering the level of housing provision for a plan period".

In light of the February 2026 publication of updated estimates of housing need in Wales (which indicate
a substantial increase in both existing unmet housing need and newly arising need), and in the context of the existing under-delivery of units evidenced within the most recent LDP AMR (i.e. which identifies a shortfall in housing delivery of 27.3% on the adopted LDP target), it is considered essential that the overall growth levels for the Replacement Plan are revisited (and increased accordingly).

Policy HG1 KS1 – Land at North West Barry
Overall Support for Allocation

The detailed supporting information prepared on behalf of Persimmon Homes in relation to the Land at North West Barry site to date, including the masterplanning work undertaken in liaison with the Local Authority and their statutory consultees, has demonstrated that a sustainable, high-quality residential development which responds sensitively to both local character and landscape setting can be delivered on the site. It is considered that the allocation of Land at North West Barry (KS1) represents an entirely suitable housing allocation, which has been evidenced as being both viable and deliverable. The
inclusion of KS1 as a housing allocation in the Deposit Plan is therefore welcomed and supported.

Policy HG1 KS1 - Detailed Wording - Objections As stated, although the representations provide overarching support for the Deposit Plan and the inclusion of Land at North West Barry as an allocation, a number of detailed matters are objected to in relation to specific elements of the proposed KS1 policy wording.

It is acknowledged that the Key Site will need to be delivered in accordance with placemaking principles (as set out in Policy SP4 Placemaking and Policy PGD1 Creating Well Designed Places), and masterplanning work to date has demonstrated that the site is fully capable for compliance with both Policy SP4 and PGD1.

Comments are provided on the additional requirements which the site is anticipated to comply with as set out at Policy HG1 KS1. Revised wording where required is identified in red.

• The provision of a minimum of 113 affordable housing units (30%) with a unit mix reflecting the requirements of the latest Local Housing Market Assessment and the Council's waiting list data.

In order to deliver a greater social mix, the affordable units should be dispersed across the site in clusters of no more than 10 units, The positioning of the affordable units will be informed by the experience and best-practice of the Registered Social Landlord responsible for the delivery and ongoing management of the units, with their delivery being phased across the development trajectory.

The policy as currently worded is considered to be overly prescriptive with regards to the positioning of affordable units on the site. It is the case the Registered Social Landlord who is responsible for the delivery and ongoing operation/management of the affordable units is best-placed to advise upon the positioning of the affordable units within the site layout. As such, it is requested that the prescriptive nature of the above bullet point is mended to allow for the RSL to advise on best practice.

• Provision of land across the site frontage to allow for the widening of the A4226 Port Road West and the delivery of an Active Travel route across the frontage of the site as part of the Weycock Cross to Cardiff Airport Active Travel route, as identified in Policy TR1 (relating specifically to the delivery of the section of the Active Travel route adjoining the northern boundary of the Key Site only).

• Creation of a new signalised junction on to the A4226 Port Road West, which will need to accommodate controlled pedestrian/cycle crossing facilities.

With regards to the first two bullet points set out under the 'Sustainable Transport and Highways' section of the Policy HG1 KS1 (copied above), to confirm, as part of the development of the Key Site, it is proposed (as detailed within the submitted Transport Assessment) to construct a new junction from Port Road to the west of the Weycock Cross roundabout at the location of the existing field gated access in the form of a signal-controlled junction, which would allow for the safe and timely exit of traffic from
the development onto the local highway network. Such an access would also provide enhanced Active Travel infrastructure in conjunction with the proposed Active Travel route between the Weycock Cross junction and Cardiff Airport. Traffic signals at the proposed site access would provide for dedicated demand dependent green time for pedestrians and cyclists along this section of the A4226 Port Road.

Significant work has been undertaken to date in demonstrating that the above is deliverable. However,
it is requested that further clarification is included within the policy text to confirm that the Key Site is not responsible for the delivery of any further/additional sections of the Weycock Cross to Cardiff Airport Active Travel route, over and above the section of the route which adjoins the Key Site.

Suggested additional text is outlined in red above.
• A proportionate contribution towards off-site improvements to the capacity and flow of Weycock Cross roundabout and other junctions on the strategic highways network where necessary (in the context of the impact of wider committed developments on the strategic highway network).

As set out within the Transport Assessment (May 2025) prepared in support of the Key Site, the traffic movements associated with the North West Barry allocation could be accommodated on the highway network with a marginal and inconsequential impact on the conditions already experienced on the local highway network. An appraisal of the impact of committed development (as agreed with the Highways Authority) has been undertaken as part of the Transport Assessment, which identifies that committed
development within the vicinity of the Weycock Cross junction would have a greater impact upon the local highway network than the North West Barry Key Site. The North West Barry development is smaller in comparison to the other committed development assessed, and would have a marginal and inconsequential impact upon the operation of the Weycock Cross junction. It is therefore considered that the policy wording should be amended to reflect the 'proportionate' nature of contributions required.

Suggested additional text is outlined in red above.
• A contribution towards off-site sustainable transport measures in the area (as necessary and related to the Key Site).

Further clarification is required in regards to the above bullet point. It will be important to ensure that any off-site

measures are directly related to the proposed development, and are necessary to ensure the acceptability of the proposed development. The requirement for a contribution towards off-site measures 'in the area' is not specific enough, and it is requested that the wording is amended as per the suggested text outlined in red above.

• The provision of a key area of open space (minimum 2.3 ha) to the south of the site adjoining Porthkerry Country Park which will serve as a buffer to the adjoining SINC at Mill Wood and offer opportunities for significant iodiversity enhancements. The ownership of this area should be
transferred to the Vale of Glamorgan Council, together with an appropriate financial contribution, for management as part of Porthkerry Country Park.

It is considered that the inclusion of a specified figure for the area of open space to be provided within the southern section of the site is unnecessary within the policy text.

The Indicative Plan for the Key Site included at Figure 13 of the Deposit Plan illustrates the indicative extent of 'Significant Open Space' to be provided adjoining Porthkerry Country Park, which will be subject to further detailed masterplanning work as the Planning Application is prepared in due course. A figure for the exact area
of open space to be provided within this section of the site cannot therefore be robustly specified until the further stages of masterplanning work are completed. As such, it is requested that the figure is removed from the policy text, with the identification of 'Significant Open Space' on Indicative Plan being considered satisfactory.

Furthermore, it is not considered appropriate that the policy wording should refer specifically to the financial contribution towards the management of this land, in addition to its transfer, as such contributions will be subject to detailed viability appraisal work at the Planning Application stage.

Deposit Plan Appendix 1 - Housing Trajectory
The identified delivery timescales and quantum of units for the site as set out at Appendix 1 of the Deposit Plan (as copied below) are agreed with and considered to be suitable/deliverable:

2028-2029: 30 units
2029-2030: 60 units
2030-2031: 60 units
2031-2032: 60 units
2032-2033: 60 units
2033-2034: 60 units
2034-2035: 46 units

Persimmon Homes are committed to the delivery of the allocation, in accordance with the phasing trajectory outlined in the Deposit Plan. Further to the detailed submissions previously made, including extensive viability evidence which has been discussed in detail with the Local Authority and their viability consultant, it is confirmed that the site is viable and deliverable in accordance with the identified delivery timescales. It should be noted that there is a possibility that the number of units to be delivered within the first year (2028-2029) could be increased slightly, however, it is considered that the above presents a realistic trajectory for the site.

Deposit Plan Appendix 2 – Infrastructure Delivery Plan
A number of amendments to the text are requested in regard to the infrastructure requirements for KS1
North West Barry as set out within the Infrastructure Delivery Plan at Appendix 2 of the Deposit LDP.

Within the 'Key site issues and constraints' section of the Infrastructure Requirements table, the following amendments to the text are considered necessary:

• Proportionate access and junction arrangements on to the A4226 and a financial contribution towards strategic highway network enhancements (in the context of the impact of wider committed developments on the strategic highway network).

As set out above, it is important that the required financial contribution towards strategic highway network enhancements is proportionate to the scale of the North West Barry development, and that additional committed developments, which would have a greater impact on the strategic highway network, are considered in the round.

• Previous desk-based assessment and site visits dentified that development would have a major impact on five features (?), including important hedgerows which form historic boundaries. Archaeological features were also identified.

The above bullet point requires clarification as to the 'five features' which the development would have a 'major impact' upon. It should be noted that masterplanning work to date has been informed by extensive survey and assessment work which ensures that the proposed development is capable of addressing all constraints.

Within the section of the table where 'broad costs' of key infrastructure requirements are outlined, it is considered that the following amendments to the text are necessary:

• Education – Estimated Cost Circa £3,730,000 (£TBC)
It is considered that an estimated cost for education contributions cannot be specified at this stage, as the contribution will be directly related to current school capacity figures at the time of the Planning Application, with school capacities being fluid and subject to change. As such, the 'circa' figure should be removed from the text and replaced with 'TBC' at this point.

• A proportionate contribution towards on-site improvements to the capacity and flow of Weycock
Cross roundabout and other junctions on the strategic highways network where necessary (in the context of the impact of wider committed developments on the strategic highway network).

• VOGC to deliver improvements to junctions on the Strategic Highways Network using s106 contributions (from the North West Barry Key Site and other relevant commitments) . As set out above, it is important that the required financial contribution towards strategic highway
network enhancements is proportionate to the scale of the North West Barry development.

• Contribution towards off-site sustainable transport measures in the area as necessary and related
to the Key Site.

As per the wording contained within the policy text of HG1 KS1, the requirement for a contribution towards off-site measures 'in the area' is not specific enough to provide certainty for the developer, and it will be important to ensure that any off-site measures are necessary and directly related to the North West Barry development.

• Community Facilities – Estimated Cost Circa £665,000 (£TBC) It is considered that an estimated cost for community facility contributions cannot be specified at this
stage – no background calculations are provided to evidence that this estimate is robust. As such, the 'circa' figure should be removed from the text and replaced with 'TBC' at this point.

Policy CC1 – Residential Operational Net Zero Carbon Development

Persimmon Homes has significant concerns regarding Policy CC1 and objects to it on the basis that it replicates requirements already being progressed at a national level through Welsh Government's Future Homes Standard (FHS). The FHS is intended to deliver "zero carbon ready" homes via a unified Building Regulations framework, making additional local policy unnecessary. At present, Building Regulations Part L1A sets out the standards for energy efficiency in new dwellings, and Persimmon
already designs its homes to go beyond these minimum thresholds. This includes enhanced insulation and improved building fabric performance, with reduced U values for elements such as walls, roofs, floors and windows to minimise heat loss. As a result, our homes typically achieve strong Energy Performance Certificate (EPC) ratings, generally in the A–B categories. Introducing further operational net zero requirements at a local planning level risks adding cost, complexity and uncertainty, potentially affecting the viability and deliverability of housing sites. The Development Plans Manual for Wales is clear that local plans should not repeat national policy or seek to regulate matters already addressed through other statutory regimes.

On that basis, Policy CC1 is not considered to be justified and is inconsistent with the second test of soundness. The proposed shift in standards from April 2030 represents a substantial and abrupt escalation in expectations. Although the policy refers to schemes such as Tai ar y Cyd and AECB CarbonLite, these examples largely relate to grant funded affordable housing projects. There is no robust evidence that equivalent standards can be met on mainstream housing sites without undermining overall viability. The Development Plans Manual requires policies to be based on strong evidence and to be realistically deliverable across the plan period. Without this, there is a risk that the proposed policy could impede
housing delivery and compromise the RLDP's ability to meet identified needs.

Policy CC1 could also lead to inconsistent energy performance requirements across Local Planning
Authorities in Wales, contradicting the advantages of a unified regulatory system via Building Regulations. For volume housebuilders working across several authority areas, this would introduce unnecessary variation and complication. The DPM highlights the importance of policies that support housing delivery and avoid avoidable burdens. By introducing bespoke modelling thresholds and
operational monitoring requirements, CC1 risks blurring the line between planning and Building Control, raising questions about the policy's justification and practical application.

It is Persimmon's view that Policy CC1 is premature and that it is more appropriate for such matters to be addressed through building control rather than planning policy. In its current form, the policy risks impacting housing supply, affordable housing delivery and overall implementation across the plan period. For these reasons, we consider that Policy CC1 fails to satisfy the relevant tests of soundness and should be removed from the emerging RLDP.

Summary

As summarised above, and set out in full detail within the supporting survey/assessment work that has been provided to the Local Authority in relation to the site, the inclusion of Land at North West Barry as a Key Site (Policy HG1: KS1) with

the Replacement Plan fully accords with the RLDP strategy. Furthermore, it is considered that (with the inclusion of the site), the Deposit Plan complies with the tests of soundness. Further to ongoing discussions with the Authority, we would reiterate the Site Promoter's commitment to delivering the allocation which has been evidenced as being entirely deliverable and viable
As set out within this representation, overall support is provided for the Deposit Plan (and the inclusion of North West Barry as a Key Site), however, as detailed, bjections are submitted in relation to the specific elements of the proposed wording of the Key Site policy (SP4: KS1).

We look forward to the RLDP progressing towards examination, and would welcome the opportunity to take part in the relevant Hearing Sessions (in relation to Policy HG1: KS1, and wider strategic policies as required). Please do not hesitate to contact me should you require any further detail or wish to discuss any aspect of the representations.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Persimmon Submission - https://valeofglamorgan.oc2.uk/a/367

6748 Object

Document Element: CC1 - Residential Operational Net Zero Carbon Development

Respondent: Hallam Land Management [854]

Agent: Savills

Summary:

Not only is the approach proposed to be taken in Policy CC1 out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Full text:

1.1. Savills is instructed by Hallam Land ('Hallam') to respond to the consultation on the Deposit version of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').
1.2. Hallam is the strategic land arm of Henry Boot PLC and is one of the UK's most well established and successful land promoters. Hallam operates throughout England, Scotland and Wales from 7 regional offices working with landowners, developers, local authorities, communities and other parties to bring forward development opportunities. Hallam has been in operation since 1990, specialising in obtaining planning permission and delivering development larger schemes including new communities and urban extensions.
Background to Representations
1.3. The Preferred Strategy was published in November 2023. The Preferred Strategy identified "Land West of St Athan" and "Land South of the B4265, St Athan" (Site IDs 456 and 457) as one of five Key Sites in the Preferred Strategy. Both of these sites are under the control of Hallam and were submitted as part of the Call for Sites. A site-specific illustrative masterplan and policy wording were provided under Policy SP4 KS5 (Land to the West of St Athan).
1.4. Hallam submitted representations on the consultation on the Preferred Strategy. These representations were very much supportive of the identification of "Land to the West of St Athan" as a Key Site and the approach that was taken more generally taken in the Preferred Strategy.
Approach to Responding to Consultation
1.5. The VoG has published the Deposit version of the RLDP. The Deposit is the first version of the RLDP to include emerging allocations, and detailed development management policies, as well as a Proposals Map. It is accompanied by a substantial evidence base which includes various supporting technical documentation submitted as part of the promotion of the allocated sites.
1.6. Building upon the Preferred Strategy, the Deposit RLDP proposes to allocate Land to the West of St Athan as a Key Site. The site is identified under Policy HG1 KS5 (Land to the West of St Athan) as key mixed-use site with capacity for 600 new homes alongside new community and commercial facilities.
1.7. Hallam's representation to this consultation broadly splits into three separate sections:
• It offers general support for the housing requirement, growth strategy and settlement hierarchy. This is covered in Chapter 2 of this Statement;
• It wholly supports the approach of allocating Land to the West of St Athan as part of the Deposit RLDP whilst also providing detailed commentary on the specific wording of Policy HG1 KS5 (Land to the West of St Athan). This is covered in Chapter 3 of this Statement; and
• It provides commentary on a range of development management policies. This is covered in Chapters 4, 5, 6, and 7 of this Statement.
1.8. As well as this Statement, Savills has provided commentary on these specific policies under the VoG's consultation website.

Policy SP1 (Sustainable Growth Strategy), Policy SP2 (Settlement Hierarchy), and Policy SP6 (Housing Requirement)
2.1. Together, these policies have the effect of:
• Setting the housing requirement to be delivered over the RLDP plan period of 7,890 homes with a flexibility allowance

applied on top so that provision is made for a total of 8,660 homes. This is the same housing requirement to that included in the Preferred Strategy which was found by Welsh Government to be in conformity with Future Wales (Policies SP1 and SP6);
• Identifying the extent of the Strategic Growth Area as the primary focus of new housing growth. Concentrations of new housing are focussed in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity. St Athan is a specifically named settlement within the Strategic Growth Area (Policy SP1); and
• Identifying St Athan as a Primary Settlement in the third tier of the settlement hierarchy. This is the same tier of the settlement hierarchy as St Athan is in the adopted LDP (Policy SP2).
2.2. Hallam are generally supportive of the aims of these three policies.
2.3. They recognise that the housing requirement has been subject to extensive scrutiny and been found to be appropriate by Welsh Government in response to the Preferred Strategy. In that sense, there is nothing further for Hallam Land to comment upon here other than to note that it should reasonably be seen as the minimum number of homes that the RLDP should be aiming to deliver, particularly following the publication of the 2022-based household projections between Welsh Government's comments on the Preferred strategy and the publication of the Preferred Strategy.
2.4. The strategy – of focussing new housing in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity – is wholly supported. St Athan is clearly already a sustainable location for growth and its sustainability and connectivity have clear potential to enhance alongside further development. The delivery of growth in St Athan is therefore considered to firmly align with the RLDP's strategy.
2.5. The continued positioning of St Athan as a Primary Settlement in the third tier of the settlement hierarchy is considered appropriate though clearly the delivery of two Key Sites within St Athan as part of the RLDP has the potential to further elevate its position in the future. This is reflected in Table 10 of Background Paper 5 Settlement Appraisal Review where St Athan is given one of the higher scores of the Primary settlements.

Policy HG1 KS5 (Land to the West of St Athan)
3.1. Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.
3.2. There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.
3.3. The relevant policy for Land to the West of St Athan is Policy HG1 KS5.
3.4. As a starting point, Hallam wholeheartedly support the allocation of Land to the West of St Athan as a Key Site within the RLDP. Hallam made a comprehensive submission as part of the Call for Sites stage and since then have worked proactively with the VoG and other stakeholders to demonstrate that the site is suitable, deliverable, and viable. It's identification as a Key Site in the Deposit RLDP represents extensive and thorough assessment – its proposed allocated is therefore considered to be sound and firmly evidence based.
3.5. So that the policy functions as effectively as possible, Hallam has a small number of comments and included at Appendix A is a re-worded version of Policy HG1 KS5 which incorporates those changes with text suggested to be removed crossed through and text to be added shown underlined.
3.6. These proposed adjustments are considered in turn below and are structured around the sub-headings that are contained within the policy wording itself.
Site Capacity and Housing Trajectory
3.7. Extensive environmental and technical work has been undertaken by Hallam to support the promotion of the site and the development of a masterplan (and site capacity) that responds to the site's constraints and opportunities.
3.8. That said, Hallam is not a housebuilder and once an outline planning application has progressed, Hallam will identify a development partner (which could be a single or multiple housebuilders / housing associations). Clearly different housebuilders have different house types and differing approaches to density.
3.9. In addition, whilst a lot of technical and environmental work has been undertaken to date, clearly further technical work would be submitted at planning application stage which would further validate the site's capacity.
3.10. Legislative and guidance changes also have the potential to impact a site capacity. Whilst the masterplanning process has been prepared to be SAB compliant, the impact of the introduction of the requirement to secure SAB approval has had an impact on site capacity and it follows that a further, and as yet unknown, legislative or guidance change could have a similar impact.
3.11. This is not to suggest that there isn't a high degree of confidence that the site can deliver roughly 600 homes, rather that Hallam suggest that the word 'approximately' is added to the policy wording to reflect the potential for a degree of deviation (which could be upwards or downwards).
3.12. Background Paper 9A Housing Land Supply and Housing Trajectory sets out the anticipated annual delivery rates for housing over the RLDP. With regards to the ability of the site to deliver the number of homes it is allocated for in the RLDP plan period, the housing trajectory for the site reflects that the first completion date was pushed back from 2027/2028 to 2028/2029 since the consultation on the Preferred Strategy. This means that the whole site continues to be shown as being delivered within the RLDP plan period.
3.13. Hallam support and agree with the approach set out in the Draft Housing Trajectory and see it to be realistic and

achievable based on their experience and subject to usual caveats around the condition of the market, RLDP progression, and swift determination of a planning application.

Affordable Housing

3.14. At present, Policy HG1 KS5 (like all of the standalone policies for the other four Key Sites), states that the site should provide a minimum of 210 affordable housing units. This figure is derived from 35% of the number of homes that the site is allocated for (600 homes).

3.15. Worded at present, a strict interpretation of this policy could be that 210 affordable units must be provided onsite regardless of the total number of homes that are proposed. For example, it could be interpreted as requiring a fixed number of affordable homes of 210 homes, even if the total number of homes that are proposed on the site is fewer than the 600 homes that the site is allocated for or, conversely, that only 210 homes should be delivered as affordable if more than 600 homes were to be delivered and the RLDP allocation exceeded.

3.16. Hallam recognise that this is not what the policy wording is seeking to achieve (and their viability work for the site is based on the site delivering 600 homes of which 35% are affordable) but suggest that its wording could be clarified by removing reference to a specific number of affordable homes for the site to deliver in favour of just the affordable housing percentage being noted in the policy.

3.17. Hallam also suggest that the requirement for affordable housing units to not be in clusters of more than 10 homes is removed and that the approach is for this to be considered on a site by site and case by case basis and with recognition that Policy HG5 (Affordable Housing Exception Sites) which can provide a framework for 100% affordable sites of more than 10 homes to be delivered. As an example, and in the case of Land to the West of St Athan, the "Land South of the B4265, St Athan" (Site ID 457) portion of the site is likely better suited to a mixed-use development alongside the future St Athan Railway Sation. This portion of the site is probably better suited to a flatted form of development (either above non-residential uses or as a block) which tend to be delivered as 100% affordable housing developments rather than comprising a mix of private and affordable housing.

Sustainable Transport and Highways

3.18. This part of the policy sets out expectations relating to sustainable transport and highways and there are a number of matters which Hallam wish to comment on.

3.19. As a starting point, Hallam support the delivery of St Athan Railway Station and therefore commits to its safeguarding. Likewise, Hallam recognise the potential suitability for the "Land Between the Railway Line and B4265, St Athan" (Site ID 458) site to accommodate a Welsh-Medium Secondary School and can also therefore commit to safeguarding land for the delivery of a pedestrian and cycle bridge over the railway line. Specific comments on Policy TR1 (Transport Proposals) and Policy CI3 (New Community Facilities) are made elsewhere in this Statement.

3.20. With regards to the Sustainable Transport and Highways section of Policy HG1 KS5, Hallam's overall position is that a careful balance needs to be reached between the policy wording being explicit as to what highway works must be delivered and reserving consideration of this until planning application stage where the exact site capacity is better understood and a full Transport Assessment submitted.

3.21. At present, Hallam's view is that the policy wording is overly explicit and suggest that it could be qualified through the addition of the following text before listing the offsite highways improvements:

'Subject to the Strategic Transport Assessment and site-specific Transport Assessment submitted at planning application stage'.

3.22. Turning to the specific offsite highways measures that are listed within the policy wording, Hallam have four comments.

3.23. Firstly, it is suggested that the delivery of an active travel link along the B4265 between the site entrance and the Gileston Road junction should be secured via a financial contribution that is pooled with KS4 Church Farm. This reflects that the delivery of this link not only links Hallam's site to other services in St Athan but also linking KS4 Church Farm to the services that are proposed and uses for which land is safeguarded within Hallam's site. Clearly this is also to the benefit of existing residents of St Athan. This would reflect the approach that is proposed to be taking for the pooling of Section 106 monies for the delivery of an active travel route between St Athan and Llantwit Major.

3.24. Secondly, Hallam flag the need for the RLDP to be sufficiently flexible with regards to the delivery of an active travel link between St Athan and Llantwit Major. Ultimately, the purpose of delivering this active travel route would be to provide a connection from St Athan to Llantwit Major Railway Station and the delivery of a Railway Station in St Athan would remove the necessity of delivering this active travel connection. Hallam's suggested amendments to the policy wording seeks to reflect this.

3.25. Thirdly, Hallam have been consistent in highlighting that, whilst there is an aspiration to deliver an improved pedestrian link along Llantwit Road, a combination of the road width and the extent of third party ownerships make delivering a continuous link very challenging with a pragmatic approach instead needing to take place that recognises the ability to deliver betterments but acknowledges that delivering a continuous link is unlikely to be possible. Hallam has suggested additional wording to clarify this.

3.26. Fourthly, Hallam highlight that the designing of a loop road within the site to facilitate access by a bus may be superfluous and represent an over-engineered solution given the potential for the St Athan Transport Interchange that land is safeguarded for under Policy TR1 (Transport Proposals) is envisaged to accommodate infrastructure to accommodate a bus connection. On that basis, it is suggested that the following clause is added to the policy wording to reflect that bus connectivity to the site may be delivered not via an internal bus loop:

'Subject to progress on the St Athan Transport Interchange as land is safeguarded for under Policy TR1 (Transport Proposals)'

Community Infrastructure

3.27. There are three points which Hallam wish to make in connection to this element of Policy HG1 KS5.

3.28. Firstly, Hallam suggest that the wording of the part of the policy relating to financial contributions to fund the delivery of additional school places needs to be adjusted. At present this part of the policy is worded as if there is an

automatic requirement to provide Section 106 monies for school places where Circular 13/97 is clear that a contribution should only be sought where the schools do not have current projected capacity to accommodate the new children from the development. Hallam's proposed adjustments seek to ensure that this part of the policy reflects this though note that Background Paper 43 Education forecasts a need for a financial contribution to be made for additional school places at all English and Welsh primary and secondary schools that the site is within the catchment of.
3.29. Secondly, Hallam note that Table 10 of Background Paper 34 Community Facilities identifies an existing over-provision of community space within the St Athan Ward of 778sqm and a surplus of 531sqm of community floorspace at 2036 when the level of housing to be allocated in the Deposit RLDP is delivered. It is understood that this is on the basis of no community floorspace being delivered as part of Hallam's proposals or as part of the KS4 Church Farm site. Hallam suggest that the wording of this element of the policy needs to reflect that community floorspace should only be required to be provided in the case of a local shortage in provision. Aligned to this, Hallam also suggest that the reference to specifically providing a 'community building' is adjusted to instead make reference to 'community space'. This reflects that the community space element of scheme, if indeed it is actually required, could be a part of a larger mixed-use building (probably in the Mixed-Use / Community area) rather than as a standalone building.
3.30. Thirdly, Hallam note the error in the wording of the sixth bullet point under the 'Sustainable Transport and Highways' heading where reference is made to the safeguarding of land on the southern side of the railway line as being identified in Policy CI3(2) where-as it should be Policy CI3(6). This is a minor amendment that should be made to ensure consistency.
Green Infrastructure, Recreation Spaces, and Biodiversity
3.31. The masterplan prepared by PAD Design and submitted by Hallam shows the site delivering a mix of public open space and green infrastructure including the provision of allotments, a Neighbourhood Equipped Area of Play, a Local Equipped Area of Play, and a sports pitch. This is welcomed in Background Paper 32A Green Infrastructure Assessment of Key Sites which, at Paragraph 5.55 recognises that a 'ground up' approach has been taken in the masterplanning approach.
3.32. This is shown indicatively to illustrate the composition of public open space and green infrastructure that the site could provide alongside the other elements of built development that the site is allocated and the masterplan makes provision for.
3.33. Whilst, Hallam recognise the need to provide public open space, the starting point for this should be the Fields In Trust Standards and Hallam therefore suggest an approach where the policy wording is not specific about what forms this should take.

Policy TR1 (Transport Proposals)
4.1. This policy identifies three active travel routes and two public transport schemes that the Deposit RLDP safeguards land for, as well as three highway improvement schemes that are identified as being required to mitigate the impact of development. Two of these are in St Athan – one being the St Athan Transport Interchange for which land is safeguarded for and the second being the Gileston Road Junction which is identified as a required highway improvement. Both are considered in turn below.
St Athan Transport Interchange
4.2. Hallam support the safeguarding of land for the St Athan Transport Interchange and see that its delivery would be to the benefit of the Key Site itself but also more broadly to St Athan and western parts of the VoG.
4.3. It is clear from discussions with Transport for Wales that there is a strong business case for the delivery of a railway station and that the creation of "critical mass" through residential development around it has a key role in driving its delivery, as does the nationally significant economic role that the Bro Tathan Enterprise Zone has and the Aberthaw Green Energy Park will have. The proximity of St Athan to both of these hubs clearly contributes to its fundamental sustainability and suitability for growth whilst the further development of a critical mass of housing and employment generating uses will further support linkages between them and strengthen the business case for a new railway station at St Athan. This is reflected in TFW's 'Today, Tomorrow, Together: A Vision for Rail Across Wales and the Borders' which confirms that the delivery of St Athan Railway Station remains in TFW's pipeline which has been endorsed by the Westminster Government.
4.4. The location that is identified on the Proposals Map is Transport for Wales' preferred location within the site and has been incorporated into the masterplanning approach which seeks to create a node around it by incorporating a bus interchange and a mix of uses.
4.5. At present, the Proposals Map identifies the location of the Railway Station using a red star which is positioned on the railway line itself but without the required land take not spatially being defined.
4.6. Whilst Hallam recognise that the exact land take required will need to be refined further through discussion with TFW, it may be the case that the mixed-use element on this portion of the site comes forward before the Railway Station.
4.7. The early delivery of these elements should be welcomed as clearly the mixed-use element both enhances the range of services and facilities in St Athan but also would mean that the Railway Station is integrated upon delivery.
4.8. On that basis, it is imperative that the safeguarding of land for the Transport Interchange is limited only to that land required to deliver the Transport Interchange and is done in such a way such the safeguarding does not sterilise non-transport related development from this portion of the site until the Railway Station has been delivered.
Gileston Road Junction, St Athan
4.9. Paragraphs 6.199 and 6.200 relate to the expectation that vehicle trips as a result of RLDP allocations in St Athan are anticipated to trigger the need to upgrade the Gileston Road Junction to a signal-controlled arrangement. This is informed by the conclusions of Table 3 of the Strategic Transport Assessment which forecasts that the junction will be operating above capacity during both the weekday AM and PM peak by the RLDP's end point.
4.10. Hallam note that Technical Note 08 of the Strategic Transport Assessment identifies that the improvements to the Gileston Road Junction are to be delivered by VoG and funded through financial contributions from seven sites that the

RLDP proposes to allocate.
4.11. Improvements to this junction are to be funded by a number of sites; however it is unclear whether (and if so, when) forward funding will be secured by the Council and clearly there cannot be a situation where none of the sites can deliver homes until strategic highways works are funded / completed. We therefore seek further clarification over the phasing of these works and note that early delivery of homes ahead of strategic highway improvements is likely to be important for deliverability of each strategic site.
4.12. To respond to Hallam's above comments, one approach could be for references to highway improvement works to be entirely removed from this policy or, if they are to remain, that qualifying text is added to note that the need for and format of any improvements will be subject to detailed consideration at planning application stage and that such contributions must be justified in planning terms, particularly where (in the case of Pen Y Turnpike Road and Waycock Cross for Land to the West of St Athan), the distance from a site and the junction to be improved is significant and therefore thee number of vehicle trips that would be generated modest.
4.13. This aligns with Hallam's suggested approach to the specific wording of Policy HG1 KS5.

Policy CI1 (Open Space Provision)
5.1. This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.
5.2. Hallam note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.
5.3. Hallam is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter.

Policy CI3 (New Community Facilities)
6.1. As well as allocating land for five new or improved education developments, this policy safeguards 'Land South of the Railway Line, St Athan' for the delivery of a Welsh-medium secondary school.
6.2. This policy is clearly of interest to Hallam because Paragraph 6.250 places a requirement for the safeguarding of land on the northern side of the railway line on their Land to the West of St Athan Key Site for a footbridge to land on.
6.3. With the policy wording being intentionally light-touch, Paragraph 6.250 of the Deposit RLDP provides greater detail about the safeguarding of this land (and other paragraphs in the Deposit RLDP relate to other community facilities that Policy CI3 covers). It effectively does two things.
6.4. Firstly, it notes that the delivery of this school will require active travel improvements including the safeguarding of land for a pedestrian and cyclist footbridge over the railway line.
6.5. Secondly, it is clear that the safeguarding of this land is in response to a forecast increase in demand for Welsh-medium secondary school places across the whole of the VoG as a result of expanded capacity at Welsh-medium primary schools across the VoG. On this basis, it follows that this location has been selected as a preferred location because of its ability to serve the wider sub-region.
6.6. Hallam recognise that this site could be a suitable location for a Welsh Medium Secondary School and, as a principle, is agreeable to the safeguarding of land for the footbridge landing on the northern side of the railway line.
6.7. Paragraph 6.250 of the Deposit RLDP is clear that the delivery of a Welsh-Medium secondary school is in response to a regional / sub-regional demand rather than a local need as a result generated either by the development of Land West of St Athan or other emerging allocations within St Athan and it cannot be the case that Hallam are expected to make disproportionate contributions to either the delivery of the school or required active travel improvements just because they have control of the site or that it is next to the Key Site.

Policy CC1 (Residential Operational Net Zero Carbon Development)
7.1. The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) before the policy wording sets out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.
7.2. As a starting point, Hallam share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) can present challenges. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this will result in an uneven framework for housebuilders, significantly adding cost and reducing certainty.
7.3. The justification for using planning policy to set requirements exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.
7.4. There are two points to be made by Hallam here:
7.5. Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage that such an approach would not be sound. This Written

Ministerial Statement was subject to an unsuccessful judicial review.
7.6. Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations. Where there are existing Local Plans in England that take this approach, they do not align with the Westminster Government's position and there will be no Local Plans emerging including such policies.
7.7. Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs (Bridgend and Merthyr Tydfil) do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound at Examination stage.
7.8. Secondly, Hallam have concerns with the approach that has been taken with regards to viability.
7.9. From Hallam's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.
7.10. As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated. This is important as it demonstrates that, whilst Hallam do not believe such a policy approach should be taken, the development of the site at the time of the completion of the Development Viability Model for the site is viable whilst meeting the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development).
7.11. Hallam's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. This concern is particularly exacerbated by the fact that, as recognised at Paragraph 6.47 of Background Paper 42 Viability Assessment, takes the lowest estimate for the works required to achieve these policy expectations, Savills' experience – both that of their development land team based in Wales and their environmental sustainability team based across England - is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.
7.12. Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy DNP3 (Glamorgan Heritage Coast)
8.1. This policy relates to the Glamorgan Heritage Coast, identifying a series of land uses that are permissible within the policy area before setting three tests that must be satisfied for development within the Glamorgan Heritage Coast to be permissible where there is an adverse environmental impact.
8.2. Hallam note that the 'Land South of the B4265, St Athan' portion of the land that they control is both proposed to be retained as part of the Glamorgan Heritage Coast (a continuation of the position taken in the adopted LDP) whilst also forming part of the Land to the West of St Athan Key Site where the masterplan at Figure 17 shows it as accommodating the potential new railway station and a mixed-use area (including car parking).
8.3. The relevant extract of the Proposals Map is replicated below:
8.4. The exact composition of the buildings proposed on this portion will require further refinement and will need to be driven by occupier requirements, but the masterplanning work undertaken by pad Design envisages that they could provide a mix of retail and food and drink uses most likely across some or all of the ground floor, alongside workshop, co-working or office incubator space at upper floor levels and perhaps at ground floor level. There could also be the potential for additional homes, likely in the form of apartments at upper floors, as part of a mix of uses. It is realistic therefore to anticipate that this portion of the site will accommodate buildings of up to three or four storeys with a high plot ratio to reflect the uses and supporting infrastructure that it is to accommodate.
8.5. Hallam's position is that the continued inclusion of this parcel of land as part of the wider Glamorgan Heritage Coast is inappropriate for two reasons.
8.6. Firstly, and its most basic level, the approach of allocating the site for development whilst retaining a designation that inherently seeks to restrict the type, form, and quantum of development, is wholly contradictory.
8.7. Designation of this portion of the site as part of the Glamorgan Heritage Coast will mean, given that the uses that Figure 17 envisages as being delivered on the site are not those that the first part of Policy DNP3 (Glamorgan Heritage Coast) allows for, any application for development will need to demonstrate that there is a compelling need for the development, that the benefits outweigh the harm, and that appropriate mitigation measures are in place. This the potential to prejudice its development or, at very least, greatly impact how it is developed whilst requiring.
8.8. Secondly, it is difficult to see how this land warrants ongoing inclusion within the designated Glamorgan Heritage Coast. This is something that is considered in more detail in the Review of Landscape Character and Visual Amenity (December 2022) prepared by FPCR and submitted as part of the Call for Sites (and also available as part of the consultation on the Deposit RLDP as a piece of Key Site Supporting Information). Paragraph 5.13 of the FPCR document concludes on this piece of land that:
'Through the fieldwork it is considered that the Site does not display any "special environmental qualities" identified by the Policy and plays no intrinsic role in the Policy designation, as it is effectively forms a rather ordinary grazing field. It is influenced by the urbanising elements of the adjacent B4265, the Railway Line, the Tarmac Cement works, and to some degree the built edge of St Athan. Furthermore, it is bound and contained by trees and woodland beside the railway line, which prevents wider intervisibility with the coastline.'
8.9. Taking the above together, Hallam suggest that the preparation of the RLDP provides the opportunity to define the

extent of the Glamorgan Heritage Coast to respond to both the landscape value of certain sites but also the wider aspirations of the RLDP. If it is not within the gift of VoG to redefine the boundaries of the Glamorgan Heritage Coast through the RLDP then Hallam suggest that an additional element could be added to this policy to confirm that it does not apply to land which is allocated for development.

Appendix A - rewording of Policy HG1 KS5

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3y3

6788 Object

Document Element: CC1 - Residential Operational Net Zero Carbon Development

Respondent: Persimmon Homes (East Wales) [1068]

Agent: Boyer Planning

Summary:

Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.

Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency.
As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.

Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.

The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.

Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently.

The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.

Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.

For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.
Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.

Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.
Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.
In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out

in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority. Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes

annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.

Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement

From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.

As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.

Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.

Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified "has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area." It also notes that this level of growth has been chosen so that it is "complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).".

Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.

Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.

In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates

which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

Policy SP2 – Settlement Hierarchy

In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.

Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.

Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.

Policy SSC1 – Development within Settlement Boundaries

Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.

Policy SP4 – Placemaking

In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.

The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.

In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car. Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.

The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.

Policy PGD1 – Creating Well Designed and Inclusive Places

Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.

On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.

Policy PGD2 – Residential Development Densities

Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.

From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.

A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure

requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the

Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.

In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.

By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.

Policy HG1 (B) – Housing Allocations

HG1 (3) Barry - Land at Hayes Lane

Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:

Unsustainable Location & Poor Connectivity

Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.

Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.

As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.

The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.

Loss of Allocated Employment Land

Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.

Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability

to meet the region's employment needs up to 2036.
By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
Policy HG3 – Housing Led Redevelopment Opportunity
Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
Policy SP7 – Affordable Housing Provision
In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
Policy SP8 – Affordable Housing Requirements
Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.

Policy SP10 – Sustainable Transport
Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.
In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
Policy TR1 – Transport Proposals
Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.
In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.
Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.
Policy SP13 – Community Infrastructure and Planning Obligations
Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
Policy CI1 – Open Space Provision
Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.
The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.
Productive and Enterprising Places
Policy CC1 – Residential Operational Net Zero Carbon Development
Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.
Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing

additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.

The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.

Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.

Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.

Distinctive and Natural Places

Policy SP19 – Green Infrastructure

In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.

For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.

The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.

Policy SP20 – Biodiversity and Ecosystem Resilience

In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Policy DNP1 – Special Landscape Areas

Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.

Policy DNP2 – Green Wedges

Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.

Policy DNP8 – Severn Estuary Recreational Pressure

Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that

key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
The policy also provides no clear threshold or criteria for determining what level of activity would constitute “visitor pressure” or an “adverse impact” on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan’s ability to meet its housing requirements and risk finding the RLDP unsound.
Conclusion
Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes’ most pertinent comments on the consultation document are summarised below:
• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale’s position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan’s ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government’s Future Homes Standard (FHS), which is intended to ensure all new homes are “zero-carbon ready” through a consistent national Building Regulations framework.
• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys’ (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council’s proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site’s progression through the next stages of the plan-making process.

Change suggested by respondent:

We believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.

Sound: No

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/38r

6852 Object

Document Element: CC1 - Residential Operational Net Zero Carbon Development
Respondent: Taylor Wimpey [386]
Agent: Savills

Summary:
Taylor Wimpey formally expresses significant concerns regarding Policy CC1 (Residential Operational Net Zero Carbon Development), which mandates that new build developments achieve net-zero operational emissions. This policy requires adherence to a specific energy hierarchy, setting stringent space heating and energy use intensity standards from the adoption of the RLDP through 2030 and beyond. It further requires on-site renewable electricity generation equivalent to a development's annual energy consumption, only allowing for off-site contributions or heat network connections when on-site solutions are technically unfeasible.

A primary objection raised by Taylor Wimpey is that setting local requirements that exceed national Building Regulations, such as the 2025 Future Homes Standard, is inappropriate and creates an uneven framework for housebuilders. They argue that Building Regulations are the proper mechanism for establishing fixed technical requirements. In the English context, a Written Ministerial Statement—which has been upheld by judicial review—clarified that local plans should not set energy efficiency standards stricter than national regulations. While Taylor Wimpey acknowledges this is a Westminster position, they contend it is incorrect to suggest there is a clear emerging trend for such localized policies in England.

Furthermore, Taylor Wimpey notes a lack of precedent within the Welsh planning landscape. They point out that two recently adopted RLDPs in South East Wales did not include such policies, leading to a lack of confidence that Policy CC1 will be found sound at examination. The company also questions the robustness of the Council's viability evidence, noting that the cost analysis is based on only three building typologies. This narrow scope fails to account for the broad range of house types used by active developers across Wales, which Taylor Wimpey suggests leads to a significant underestimation of delivery costs.

The financial viability of these requirements is a major point of contention, as Taylor Wimpey's experience suggests the actual cost per unit is closer to £15,000 or £20,000, far higher than the Council's estimates. They also highlight a significant timing gap in the evidence; the cost assessments were established in early 2024, yet the housing trajectory does not forecast first completions until 2028 or 2029. This five-year lag between the cost baseline and actual delivery creates unacceptable uncertainty. Consequently, Taylor Wimpey concludes that Policy CC1 is out of step with broader planning approaches and lacks the necessary certainty to be implemented without harming the overall deliverability of housing.

Full text:
1. Introduction

1.1.1 Savills is instructed by Taylor Wimpey PLC ('Taylor Wimpey') to respond to the consultation on the Deposit Plan as part of the preparation of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').

1.1.2 The submission is made in the context of Taylor Wimpey's position as the promoter of Site ID 376 (Land West of Swanbridge Road, Phase 3). The site is being promoted for a residential development comprising of 260 homes.

1.1.3 Taylor Wimpey is one of the UK's leading national housebuilders, with extensive experience in delivering high-quality residential developments across a wide range of local authority areas. The company has an established presence within the VoG area. Taylor Wimpey is in the process of delivering Phase 1 of the site with development of Phase 2 close to commencing to dovetail with the completion of Phase 1. Phase 3 would act as a logical extension to the site, effectively rounding off development in this part of Sully and dovetailing with Phase 2 which is anticipated to be completed in 2029.

1.1.4 The site was originally submitted as a candidate site as part of the Call for Candidate Sites stage in September 2022 by Taylor Wimpey. This was a comprehensive site submission demonstrating that the site was viable, deliverable and sustainable – the three tests for Candidate Sites to satisfy as set out in Paragraph 3.36 of the Development Plans Manual. The Candidate Site submission consisted of the following information:

• Archaeological Desk-based Assessment (prepared by RPS);
• Design Vision (prepared by Pegasus Group);
• Drainage Strategy & Flood Risk Assessment (prepared by Pheonix Design);
• Landscape Appraisal (prepared by Pegasus Group);
• Preliminary Ecological Appraisal (prepared by Soltys Brewster);
• High Level Viability Statement (prepared by Savills);
• Transport Technical Note (prepared by Vectos); and
• Supporting Statement (prepared by Savills).

1.1.5 Since then, and on behalf of Taylor Wimpey , Savills have also responded to the consultation on the Preferred Strategy in February 2024 as well as the Housing Growth in Barry consultation in July 2025 and the Housing Trajectory in

October 2025.

1.1.6 This supporting statement is structured to initially comment on the approach taken by the VoG in assessing the Land West of Swanbridge Road, Phase 3 site before commenting on specific policies that are contained within the Deposit RLDP.

1.1.7 In general, Taylor Wimpey's position is that, at present, the Deposit RLDP is not sound but that it could be made sound through the amendments as suggested throughout this Statement.

2. Candidate Site Assessment Process and Integrated Sustainability Assessment
Introduction

2.1.1 Candidate sites are in essence assessed through two means – the Candidate Site Assessment Background Papers and the Integrated Sustainability Appraisal.

2.1.2 Taylor Wimpey's position is that both of these documents do not provide an adequate assessment of the Land West of Swanbridge Road, Phase 3 site.

2.1.3 Each is considered in turn below.

Candidate Site Assessment Process

2.1.4 All candidate sites have been assessed at Preferred Strategy stage (reported as Background Paper 18) and Deposit stage (reported as Background Paper 18a).

2.1.5 The reason for the Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site not being carried forward as part of these assessments was presented in Background Paper 18 at the time of publication of the Preferred Strategy with Backgropund Paper 18a providing no further site analysis. The reason for the site not progressing this stage of the Candidate Site assessment process is as follows:

"Development of the site would lead to a loss of the Best and Most Versatile Grade 3a agricultural land contrary to national policy."

2.1.6 Whilst parts of the site do constitute Best and Most Versatile (BMV) land, Taylor Wimpey's position is that there are compelling reasons relating to the site's context and how it is utilised that mean a more nuanced position needs to be taken. Without such nuance, the RLDP risks not allocating a site that, whilst perhaps containing BMV, is otherwise suitable for development and more suitable for development then sites that the Deposit RLDP proposes to instead allocate.

2.1.7 Included at Appendix A, and included as part of Taylor Wimpey's representations on the Preferred Strategy and the Housing Growth in Barry consultations, is an Agricultural Assessment prepared by The Andersons Centre.

2.1.8 The key conclusions from this Assessment are that:

• The site is farmed by a tenant farmer whose main base is approximately 12km away which presents logistical and practical challenges. These challenges are exacerbated by the lack of farm buildings and the fact that there is no mains electricity;

• The site forms part of a wider 230 acre farm and so the cessation of agricultural practices on this parcel will not, by virtue of its size, prejudice the continued farming of the wider land parcel;

• The tenant farmer farms approximately 3,000 acres of land and so the loss of the ability to farm this parcel will have a negligible impact on the continuation of their agricultural operations;

• The site is bound on two sides by existing or permitted housing, on a third boundary by a railway line, and on its eastern boundary by a road; and

• Farming of the land does not support a high level of employment and if the land was lost for development, 0.15 of a full time labour unit's equivalent work would be lost.

2.1.9 Taking the above together, the conclusion needs to be reached that the site's size and context presents challenges for farming and that the development of Phase 2 by Taylor Wimpey has the potential to exacerbate these challenges. Aligned to this, the level of employment that the farming of the site supports is negligible and the cessation of farming of this particular parcel of land will not materially impact either the continued farming operations of the wider farm that the land sits apart of or the tenant farmer that farms the land.

Integrated Sustainability Appraisal

2.1.10 The Initial Integrated Sustainability Appraisal undertaken at Preferred Strategy stage provides a GIS based appraisal of all sites against 17 objectives. Inherently the Initial Integrated Sustainability Appraisal can be a bit of a blunt tool but Taylor Wimpey's position is that the site performs better against a substantial number of the 17 objectives than the current assessment.

2.1.11 Included at Appendix B is an assessment undertaken by Taylor Wimpey which provides commentary against certain objectives and suggests why the site performs considerably better than forecast in the Initial Integrated Sustainability Appraisal.

2.1.12 A summary of this is presented below:
Table 1 Summary of ISA and Suggested Taylor Wimpey Approach

2.1.13 Taylor Wimpey's position here is clear – the inadequacy of the Integrated Sustainability Appraisal as a tool for assessing candidate sites can only be appropriate where the Integrated Sustainability Appraisal is done correctly and considers the mitigation measures that a candidate site submission proposed to put in place. Without this, the Integrated Sustainability Appraisal risks a situation – as Taylor Wimpey suggest has been the case in Policy HG1 KS1 – where a Key Site is selected in favour of alternative sites that are better performing.

3. Deposit Plan

3.1 Introduction

3.1.1 The following section of this Statement comments on the relevant Key Themes, Strategic Objectives and draft Policy Framework forming part of the Deposit Plan Consultation.

3.1.2 The Policy Framework has been reviewed with comments provided on only those policies considered to be of most relevance to Land West of Swanbridge Road (Phase 3), Sully. The position on individual policies contained within the Deposit RLDP are summarised in the table below:

Table 2 Taylor Wimpey Policy Position

Relevant Policy Support or Object
SP1 Sustainable Growth Strategy - Object
SP2 Settlement Hierarchy - Support
SP 6 Housing Requirement - Object
HG1 Housing Allocations: HG1 KS1 – Land at North West Barry - Object
TR1 Transport Proposals: TR1(2) Active Travel Route Sully to Cosmeston - Support
TR1 Transport Proposals: TR1(6) Highway Improvement Works Weycock Cross Roundabout - Object
CC1 Residential Operational Net Zero Carbon Development - Object
CI1 Open Space Provision - Clarity required
DNP5 Environmental Protection - Object as currently worded

3.2 Key Themes and Strategic Objectives

Homes For All

3.2.1 As noted in paragraphs 3.17 and 3.18 of the Deposit Plan the VoG has the highest affordability ratio in Wales with average house prices 9.7 times the average workplace earnings compared to the Welsh average, giving rise to a significant need for affordable homes which is under significant pressure. This highlights the ever increasing need for sufficient high quality housing, which Taylor Wimpey are committed to provide and supply the mix, type and tenure of housing needed within the local authority's growing population.

Placemaking

3.2.2 Taylor Wimpey embed strong placemaking standards across their developments as detailed within their Placemaking Charter. Taylor Wimpey consider Land West of Swanbridge Road (Phase 3) to present an opportunity to provide a comprehensive residential development that is accessible and well-connected with the existing settlement of Sully and compliments the earlier phases of development. As demonstrated in the earlier phases of development, the Site offers a sustainable location for future growth with easy access to a range of services and facilities in Sully.

Protecting and Enhancing the Natural Environment

3.2.3 Taylor Wimpey support the VoG's commitment to protect and enhance the natural environment through the integration of green/blue infrastructure network and the sustainable management of resources within the VoG. However where Objective 5 seeks to safeguard land from inappropriate development, proposals must be subject to the relevant planning balance giving weight to the surrounding land use and appropriateness of safeguarding agricultural land that would otherwise be unconstrained and considered suitable for development given the outstanding need for housing.

Promoting Active and Sustainable Travel Choices

3.2.4 Taylor Wimpey support the promotion of sustainable travel and active modes of transport, including the provision of designated active travel routes that improve the connectivity between primary and key settlements, such as the Sully to Cosmeston active travel route.

3.2.5 As demonstrated in the earlier phases of Land West of Swanbridge Road, Taylor Wimpey support the promotion of active travel within new developments and provide opportunities for residents to easily engage with active travel.

3.3 Policy Framework

Policy SP1 Sustainable Growth Strategy

3.3.1 Taylor Wimpey's comments on this policy relate to the sustainable growth strategy in so much as it relates to the spatial strategy rather than the housing requirement that the RLDP adopts with further comments on the housing requirement provided in connection to Policy SP6 (Housing Requirement).

3.3.2 Taylor Wimpey appreciate the need to balance the ten strategic objectives against the need for growth and protection of the VoG's natural and built environment, and strongly support the strategic objective to provide homes for all. Taylor Wimpey maintain their position on the proposed growth strategy that has been established within earlier consultation responses submitted throughout the RLDP process, including the most recent consultation on 'Growth Options in Barry'.

3.3.3 Taylor Wimpey consider that to date the growth strategy has placed disproportionate emphasis on identifying an alternative site within Barry, rather than giving due consideration to potential sites in nearby high-performing settlements such as Sully. Taylor Wimpey therefore strongly encourage the VoG to widen the search for additional allocations beyond the administrative boundary of Barry Town Council and to consider locations that represent a logical and sustainable extension to neighbouring primary settlements that are located within the Strategic Growth Area, including Sully.

3.3.4 The six key elements of the Sustainable Growth Strategy are noted and Taylor Wimpey support a spatial strategy that locates major new development for the delivery of sustainable housing growth in appropriate locations, such as Sully, that are supported by the relevant infrastructure, services and facilities. Providing new homes within Phase 3 aligns with the Strategic Growth Area identified within the RLDP Strategy which forms the primary focus for housing growth.

3.3.5 Policy SPG1 continues to identify Sully as a location where new housing development will be concentrated, therefore establishing a principle of development for Phase 3 and help to further align the provision of new housing with the existing facilities of Sully, reducing the need to travel. Sully represents an inherently sustainable location for future growth and aligns well with the Sustainable Transport Oriented Growth Option. As identified in the Deposit RLDP, Sully is classified as a Primary Settlement and performs a complementary role to Barry as a key centre. Its position within the Strategic Growth Area further indicates that an appropriate level of development at Sully would be acceptable, with both existing housing delivery and the current allocation at Swanbridge Road supporting its established role.
3.3.6 With existing development ongoing to the north of the Site, at Phases 1 and 2 of Land West of Swanbridge Road, Phase 3 is considered to provide an appropriate level of growth in a sustainable location that would form a logical extension to existing allocations. The sustainability and suitability of Sully to accommodate residential development is reinforced by the allocation of 500 dwellings under Policy MG2(37) ('Land West of Swanbridge Road, Sully') on land directly north of the site promoted by Taylor Wimpey. The progression of this location into a phase 3 development would continue to strengthen Sully's function as a primary settlement and would constitute a logical and coherent extension to the existing built form.

Figure 1 Extract of Growth Strategy

3.3.7 Taylor Wimpey appreciate the aspirations of the Council to deliver housing to meet the identified future housing needs of the VoG and wider growth aspirations of the South East Wales Region at a strategic level. Taylor Wimpey support the revised strategy moving away from North East Barry, however maintain the position that this level of growth should be re-allocated to those locations that are most suitable for growth, including sustainable settlements outside of Barry. Growth should not be focuses solely on Barry.

Policy SP2 Settlement Hierarchy

3.3.8 Taylor Wimpey support the conclusions of the Settlement Appraisal Review Background Paper which identifies Sully as a Primary Settlement, reflecting its important role in providing a level of housing growth, in addition to key local services and facilities. Within this Background Paper, Sully is recognised for its vital role as a sustainable community, scoring highly across all key principles in demonstrating its sustainability by providing for the day-to-day needs of its residents. Taylor Wimpey concur with the supporting evidence which reinforces Sully's importance within the settlement hierarchy.

3.3.9 Whilst Draft Policy SP2 presents a 'broad distribution of development within the Strategic Growth Area..', serious

concerns continue to be raised around the level of growth around Barry and the emphasis placed on it as the focus for future development. Taylor Wimpey do not dispute the identification of Barry as a Key Settlement, given its position as the largest town within the VoG, however believe Barry should not remain the sole focus for growth where there are opportunities available around primary settlements located within the Strategic Growth Area.

3.3.10 Put another way, it seems perverse for the Deposit RLDP to direct no new growth to a Primary Settlement within the identified Strategic Growth Area.

Policy SP 6 Housing Requirement

3.3.11 The purpose of this policy is to set the housing requirement and then identify the components of supply that are anticipated to meet this housing requirement. A number of Background Papers (nos. BP7, BP8, BP8A, ad BP9A) underpin the approach that is taken. Taylor Wimpey have a number of comments to make on the approach taken in this policy.

Housing Requirement

3.3.12 The approach taken in the Deposit RLDP, as with the Preferred Strategy beforehand, is for the housing requirement to make use of a 10 year dwelling-led scenario, an approach that reflects past completions and looks to extrapolate this forward over the lifetime of the RLDP.

3.3.13 Taylor Wimpey provided detailed commentary on the proposed housing requirement in their comments on the Preferred Strategy but note that Welsh Government have subsequently provided their comments on the Preferred Strategy raising no objection with the housing requirement proposed to be taken.

3.3.14 Taylor Wimpey's position though remains – if a dwelling-led scenario is to be used to determine the housing requirement then it needs to have a far shorter scenario length then 10 years as the first three years of the 10 year period selected were when supply was suppressed as a result of the current LDP not having been adopted.

3.3.15 That said, there is a clear contextual change since the Preferred Strategy was adopted, this being the publication of the 2022-based household projections have been published. Table 5 of Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections provides a comparison of the 2022-based projections with the 2018-based projections and the Deposit RLDP's housing requirement. A simplified version of this table is shown overleaf:

Table 3 RLDP Housing Requirement
Scenario Housing Requirement
RLDP 7,587
2018-based projections 6,214
2022-based projections 9,623

3.3.16 This is important as Paragraph 4.2.6 of PWW states that:

'The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans.'

3.3.17 The proposed approach of continuing to use the 10 year dwelling-led scenario, as a methodology, clearly does not do this.

3.3.18 The approach of using the 2022-based household projections would comply with the aspirations of PPW. Taylor Wimpey's position is that the commentary provided in the Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections for not using 2022-based projections is wholly inadequate and that these projections should be used.

Flexibility Allowance

3.3.19 Paragraph 5.58 of Edition 3 the Development Plans Manual (March 2020) makes it clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes the RLDP should plan for. This is in the interest of ensuring that sufficient housing is delivered in the event of some allocated sites either not delivering in their entirety or delivering less homes than anticipated. Paragraph 5.59 of the Manual clarifies that the extent of the flexibility allowance should be informed by local issues with 10% as a starting point (i.e. as the minimum).

3.3.20 The Adopted Local Development Plan (ALDP) applies a 10% flexibility allowance on top of the housing requirement for 9,460 homes so that provision is made for 10,408 homes.

3.3.21 Paragraph 1.2.34 of the Annual Monitoring Report 2024-2025 provides a comparison of the number of homes that have been completed and the level of completions that the ALDP anticipates. This shows that 6,999 homes have been delivered up to 1st April 2025 against a cumulative dwelling target of 8,829 homes, representing a shortfall of 20.7%.

3.3.22 Taylor Wimpey's point here is that the ALDP's flexibility allowance of 10% is insufficient to ensure that the ALDP's housing requirement is actually being delivered. This is clear evidence that a higher flexibility allowance should be used for the RLDP. Although for different reasons, but following a direction from the Welsh Government Planning Inspector, Bridgend County Borough Council has increased its flexibility allowance to 20% and, it is considered that such a buffer is appropriate for the VoG's RLDP.

Non-Delivery Allowance on Land Bank

3.3.23 Line C of Table 2 of the Preferred Strategy relates to those sites that either benefit from planning permission or are subject to a resolution to grant planning permission subject to planning permission. Combined, these sites are identified as having capacity for 1,860 homes.

3.3.24 The current approach, which assumes that all other sites which are under construction or sites where there is either a planning permission in place or sites where there is a resolution to grant planning permission subject to the signing of a Section 106 agreement will be completed in full, causes concern for Taylor Wimpey.

3.3.25 There are multiple reasons why homes that benefit from either planning permission or a resolution to grant planning may not be delivered. These relate to viability, but also to specific site constraints and landowner intentions.

3.3.26 A point that is separate, but inherently linked, to the above is that often the capacity of a site for which reserved matters approval is sought is less than that permitted at outline stage. Requirements for SAB approval and the demonstration of a biodiversity net benefit, for example, reduce the capacity of a site at detailed design stage but are often not factored in at outline stage, particularly where the outline application is not progressed by a housebuilder.

3.3.27 Research undertaken by the Local Government Association for England (no such data is available for Wales) suggests that, between 2010/2011 and 2019/2020 a total of 2,782,300 dwelling were granted planning permission whilst there were only 1,627,730 completions. This means that during this period just 58.5% of those homes which were granted planning permission were completed.

3.3.28 Taylor Wimpey is not suggesting that applying a discount of 41.5% is necessarily correct and the above is both from England and a few years out of date but the need for a discount that relates specifically to Line C is very clear.

3.3.29 It's difficult to know what this figure should be but Taylor Wimpey suggest that a 20% figure is used to reflect the flexibility allowance.

Windfall Allowances

3.3.30 The approach taken in the Deposit RLDP is to assume that 1,303 homes will be delivered across Windfall Sites. This has been calculated on the basis of previous completion delivered as windfalls.

3.3.31 Taylor Wimpey's concern is that the delivery of homes on Windfall Sites inherently becomes more challenging over time as the easier to develop sites have been delivered and the buildings and land that hasn't been developed is subject to increasing levels of policy protection. The approach taken by Cardiff Council in their Deposit RLDP is to assume that 75% of the 10 year average Windfall Sites will be delivered and such an approach seems entirely appropriate in this case.

3.3.32 An Urban Capacity Study (October 2023) prepared by the VoG, seeks to corroborate this by identifying 2,627 homes that could be delivered across the VoG. Whilst the windfall allowances would be less than the suggested urban capacity, this shouldn't be seen as problematic or as a conflict as the purpose of the Urban Capacity Study is, as the name suggests, just to identify sites which may have capacity. It doesn't account for land ownership (and whether the land owners have aspirations to dispose of the site) or development viability. In addition, the approach taken to site capacity to is to assume a density based on site type but it does this without an appreciation of site constraints and is based on the gross rather than net area.

Rolled Forward Sites

3.3.33 Taylor Wimpey have concerns with the approach that is taken in Table 2 of the Deposit RLDP which identifies allocations for 959 homes that are to be rolled over from the ALDP to the RLDP.

3.3.34 Concerns are raised around two sites in particular - Land to the west of Pencoedtre Lane, Barry and Land between new Northern Access Road and Eglwys Brewis Road, These sites are allocated in the ALDP but have failed to be delivered. Given the longstanding period during which there has been clear policy support for development but no completions, it follows that there are serious concerns around the deliverability of these two sites which, together, are allocated for 370 homes.

3.3.35 The failure to deliver these dwellings is due to a number of factors which are detailed in Taylor Wimpey's Preferred Strategy consultation response, which questions whether these sites will deliver at all or at a significantly

reduced capacity due to the following reasons:

■ Viability constraints;
■ Site specific constraints;
■ Landowner intentions;
■ Requirements for SAB approval; and
■ Biodiversity net benefit;

3.3.36 Whilst it is recognised that there may be policy support for the delivery of these two sites, there deliverability is clearly uncertain and they should be removed from Table 2.

Conclusion

3.3.37 The following table summarises the approach previously proposed in the Deposit RLDP and compares it to the amendments suggested by Taylor Wimpey in the preceding sections of this Statement.

Table 4 Deposit RLDP Housing Supply and Taylor Wimpey's Suggested Approach
Housing Supply - Deposit Plan (December 2025) - Taylor Wimpey Suggested Approach (March 2026)
Housing Requirement - 7,890 - 9,623
Flexibility Allowance - 10% - 20%
Flexibility Allowance – 770 - 1,925
Housing Requirement + Flexibility Allowance - 8,660 - 11,548
A – Completions - 1,747 - 1,747
B – Units Under Construction - 313 - 313
C and D- Units with Planning Permission Minus Non-Delivery Allowance - 1,777 1,488
Existing Supply - 3,827 - 3,548
E – Large Windfall Sites - 720 - 540
F – Small Windfall Sites - 583 - 438
E+ F Total Windfall Allowance - 1,303 - 978
RLDP Allocations - 3,520 - 3,150

3.3.38 The conclusion reached in Taylor Wimpey's analysis is that, as a result of both the suggested housing requirement and flexibility allowance combined with Taylor Wimpey's comments on the components of supply, the Deposit RLDP needs to find allocations to deliver a further 3,872 homes.

Policy HG1 KS1 – Land at North West Barry
3.3.39 Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. Taylor Wimpey has provided comments on the housing requirement that is set in the RLDP and the components of supply that are anticipated to meet it in the proceeding sections of this Statement.

3.3.40 As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.

3.3.41 There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.

3.3.42 Policy HG1 KS1 proposes to allocate the site known as 'Land at North West Barry'.

3.3.43 The proposed allocation of this site follows a consultation – entitled 'Housing Growth in Barry' - undertaken by the VoG in July 2025 which proposed to allocate three sites in Barry as an alternative to the North East Barry site that was identified as a Key Site in the Preferred Strategy but was considered to no longer be deliverable.

3.3.44 Taylor Wimpey responded as part of the 'Housing Growth in Barry' consultation, supporting the removal of North East Barry as a Key Site but raising serious concerns with the proposed allocation of 'Land at North West Barry' as an alternative.
3.3.45 These concerns remain and Taylor Wimpey strongly consider there need to be other alternative sites – such as Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) - within nearby settlements that perform better than the Land at North West Barry site and should be allocated for housing.
3.3.46 To support this conclusion, Taylor Wimpey has undertaken a review of the Integrated Sustainability Appraisal (ISA) which provides a scoring of different candidate sites against the 17 objectives as well as considering and comparing the sustainability and accessibility of the two sites.

Integrated Sustainability Appraisal

3.3.47 The below table provides a comparison of how the Integrated Sustainability Appraisal scores Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) compared to the Land at North West Barry site. Two different comparisons are provided – one which compares the actual scoring in the ISA and a second which compares the two sites following Taylor Wimpey's suggested scoring which is included as Appendix A.

3.3.48 These tables clearly highlight where the subject site out performs North West Barry across numerous objectives.

Table 5 Comparison of Phase 3 Land West of Swanbridge Road (Site ID 376) and North West Barry (Site ID 490) ISA performance

3.3.49 From an initial review, the Integrated Sustainability Appraisal shows that Land West of Swanbridge significantly outperforms North West Barry in terms of the number of significantly positive scores '++' and the number of '—' scores. To this end the subject site provides clear advantages above and beyond North West Barry in terms of homes, health, and transport. As such Land West of Swanbridge is considered to have the capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge; The site is within 800m of a health service and an active travel route; and, The site is within close proximity (≤800m) to a railway station or bus stop, town/ retail centre and an active travel route. Taylor Wimpey consider this assessment should go further to recognise the associated benefits to the leisure than be provided by the site's development.

3.3.50 Following Taylor Wimpey's re-assessment of the site against the Integrated Sustainability Appraisal ISA objectives it is also considered to obtain notably more positive '+' scores than North West Barry. It is also worth noting that North West Barry has more unknown impacts than Land West of Swanbridge which introduces a level of uncertainty around its potential for further negative impacts. Moreover, North West Barry scores a significant number of negative impacts across the ISA, with the extension site obtaining double the amount than Land West of Swanbridge Road.

3.3.51 Taylor Wimpey's position is that it would be unsound to allocate a site that performs considerably poorer in the Integrated Sustainability Appraisal than a site that is not proposed to be allocated.

Accessibility and Sustainability

3.3.52 SLR Consulting have prepared an updated document demonstrating the Site's sustainability credentials and providing a detailed overview of existing and future active travel and public transport infrastructure. This is included as Appendix C.

3.3.53 As a starting point, it considers those services within Sully. In terms of local amenities, the population size of Sully, naturally benefits from a good range of local amenities and services, and therefore it is anticipated that a high proportion of future residents' day-to-day journeys would be contained within the village and undertaken via walking or cycling. The Walking Catchment Map prepared by SLR demonstrates this and illustrates services within walking distance from the Site.

3.3.54 The proposed development benefits from local existing and future / planned infrastructure which will help support travel by sustainable modes such as walking, cycling and public transport. The Site falls within the less than 15 minutes Public Transport Catchment for bus and rail services. The Site is supported by the existing bus network, connecting Sully with Barry, Penarth and Cardiff – the nearest bus stop approximately 400m from the centre of the site; Moreover the Site is within proximity to Cadoxton and Penarth railway stations which have regular services in each direction in addition to the existing walking and cycling infrastructure in and around Sully.

3.3.55 The future accessibility of the Site will be further enhanced through the ongoing and planned South Wales Metro improvements, future active travel routes and the proposed Sully to Penarth mixed use link. The below figure shows several newly proposed active travel routes running close to the site including a new walking / cycling route along Swanbridge Road. Planning applications are now being submitted to support the delivery of these new active travel links. In March 2025 a planning application was submitted proposing a new route between Palmerstown and Dinas Powys.

3.4 SLR have undertaken further assessment work comparing the sustainability credentials of Land West of Swanbridge Road to Land North West of Barry. Land North West of Barry, is separated from the existing built-up area by the B4266 Pontypridd Road where the eastern and southern boundaries abut residential properties. As such, the proposed access for all modes would be taken from the A4226 Port Road West. The A4226 and B4266 can be a barrier to the promotion of active travel in that they facilitate vehicular travel and do not provide an attractive environment for pedestrians.

3.5 Furthermore, Land North West of Barry is on the fringes of Barry and had few if any facilities within a 10 minute walk, other than bus stops. In comparison, Land West of Swanbridge Road in Sully benefits from its proximity to the High Street in Sully and the services there.

3.6 The below table demonstrates differences in accessibility to amenities between the two sites, where Land West of Swanbridge Road presents a more favourable location for future development.

Table 6 Comparison of Local Facilities Between Land North West of Barry (Site ID 449) and Land West of Swanbridge Road (Phase 3) (Site ID 376)

3.7 Whilst the walking distance shown from Land North West of Barry to the nearest bus stop is slightly less than the Swanbridge Road Site, it should be noted that the bus services that can be accessed from Sully are more frequent and more direct than those which can be accessed from Land North West of Barry.

Conclusion

3.8 Taking the above together, the conclusion Taylor Wimepy reach is that their Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site performs more strongly than the Land North West of Barry site.

Policy TR1 Transport Proposals

3.9 The draft transport proposals contained within the Deposit RLDP have been reviewed with the following proposals considered to be pertinent to the Site and draft residential allocations.

TR 1 (2) Active Travel Route: Sully to Cosmeston

3.10 Taylor Wimpey support the designation of an active travel route connection the eastern side of Sully with Cosmeston in the north-east. Most notably the proposed route will pass Swanbridge Road which provides direct access to Land West of Swanbridge Road Site, with Phase 3 in close proximity to the travel route. The proposal would further enhance the accessibility and sustainability of the Site as a logical extension for residential development in Sully.

Figure 4 Extract of Deposit RLDP Proposals Map with Land West of Swanbridge Road (Phase 3) Identified

TR1 (6) Highway Improvement works: Weycock Cross Roundabout, Barry

3.11 Taylor Wimpey raise concerns around the proposed works at the Wyecock Cross Roundabout, compared to the other improvement works proposed. As noted in the Deposit RLDP, this roundabout forms a key connection within the wider strategic highway network and therefore of high importance for the local area and surrounding communities. The proposed options presented within the Deposit RLDP provide little certainty of the scope of works required with no preferred option identified. This raises concerns around the impacts of the highway improvements on the deliverability of the adjacent draft allocation of North West Barry. The same concerns arise when considering the roundabout improvement works in combination with the proposed access strategy contained within North West Barry's supporting information package. The proposed road widening measures (c.11m increase) required to make the draft allocation accessible would have a significant impact on the wider transport network at this strategic junction.

Policy CC1 (Residential Operational Net Zero Carbon Development)

3.12 The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) then setting out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.

3.13 As a starting point, Taylor Wimpey share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) is not appropriate. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this results to an uneven framework for housebuilders, significantly adding cost and reducing certainty.

3.14 The justification for exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.

3.15 There are two points to be made here:

3.16 Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage. This Written Ministerial Statement was subject to a judicial review which was dismissed with the position taken in it found to be legally sound.

3.17 Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than

building regulations.

3.18 Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound.

3.19 Secondly, Taylor Wimpey have concerns with the approach that has been taken with regards to viability.

3.20 From Taylor Wimpey's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.

3.21 As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated.

3.22 Taylor Wimpey's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. Savills' experience is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.

3.23 Taylor Wimpey's other concern with this approach is that the figure assumed as being required to achieve the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is driven from a Cost Assessment report published in January 2024. With the Background Paper 9A Housing Land Supply and Housing Trajectory not forecasting first completion onsite until 2028/2029, there is likely to be a period of approximately five years from the establishment of the figure for delivering the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) and when the first units would be delivered onsite.

3.24 Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy CI1 (Open Space Provision)

3.25 This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.

3.26 Taylor Wimpey note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.

3.27 Taylor Wimpey is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter, Policy DNP5 Environmental Protection

3.28 Taylor Wimpey consider the inclusion of 'the loss of the best and most versatile agricultural land' to be at odds with the other elements listed, where unlike the others mentioned, the loss of agricultural land would have limited, if any, impact on people, residential amenity and property.

3.29 It is acknowledged that the loss of BMV agricultural land may impact the VoG's overall amount of high quality agricultural land, however this should be assessed against the existing high level of BMV agricultural land within the County. The extent to which its loss is considered "unacceptable" should be subject to the planning balance against the overriding need for affordable housing and local housing need. Consideration towards the farming business case and economic viability are also required within the planning balance. In the case of Land West of Swanbridge Road, the loss of BMV agricultural land remains the only constraint that cannot be overcome, as noted in the Candidate Site Assessment. Whilst the loss of high quality agricultural land should be avoided, Taylor Wimpey consider that where the merits of the Site are overwhelmingly in favour for sustainable residential development in a suitable and logical location, Policy DNP5 should not stand in the way of housing delivery.

3.30 Whilst Taylor Wimpey support the clause within the draft policy: "Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the impact identified to an acceptable level. Planning conditions may be imposed, or legal obligation entered into, to secure any necessary mitigation and monitoring processes." However, in the context of BMV agricultural land, it is not clear how the mitigating measures, in the form of planning conditions or legal obligations, can be applied. This reinforces the earlier view that the

inclusion of 'the loss of the best and most versatile agricultural land', as currently worded within the draft policy, is at odds with the other elements listed where mitigation strategies for pollution can be suitably conditioned.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Redacted Deposit Representation Form - https://valeofglamorgan.oc2.uk/a/3c8
Redacted Candidate Site Rep Form - https://valeofglamorgan.oc2.uk/a/3c9
Redacted Candidate Site Rep Form 2 - https://valeofglamorgan.oc2.uk/a/3cv
Redacted ISA HRA Representation Form - https://valeofglamorgan.oc2.uk/a/3cb
Redacted Supporting Evidence - https://valeofglamorgan.oc2.uk/a/3g5

6921 Object

Document Element: CC1 - Residential Operational Net Zero Carbon Development

Respondent: Barratt Redrow Homes [2669]

Agent: Boyer Planning

Summary:

Barratt Redrow strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. risks imposing additional cost and complexity that undermines site viability and deliverability.

The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).

The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy.

Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale.

Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.

Full text:

1. INTRODUCTION

1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.

1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:

- Section 3 – The Vale of Glamorgan Key Characteristics;
- Section 4 – RLDP Key Themes, Vision, and Objectives;
- Section 5 – Sustainable Growth Strategy; and
- Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.

1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):

- Test 1 – Does the Plan Fit?
- Test 2 – Is the Plan Appropriate?
- Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS
Settlement Pattern
2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.
2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Need
2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
3. RLDP KEY THEMES, VISION, AND OBJECTIVES
3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.
Key Themes
3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally

effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY
Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.

4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526

dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
5.10 For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
5.11 More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
5.12 Whilst Barratt Redrow appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range, having reviewed the Deposit Plan evidence base Barratt Redrow believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
5.13 In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
5.14 Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
5.15 In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
5.16 In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need. Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has

technically already commenced (2021 to 2036) and therefore is made up of

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual
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sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.

5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.

5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.

5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.

5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.

5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.

5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.

5.27 In summary, Barratt Redrow acknowledge the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

5.28 These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance and additional site allocations, such as Swn Y Coed, Wenvoe, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

Policy SP2 – Settlement Hierarchy

5.29 Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.

5.30 Accordingly, despite Wenvoe being identified as a primary settlement, Policy SP2 notes that development in this location will be limited to 'the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.' Similarly, it is noted that Policy SP2 does not consider Wenvoe to be an appropriate location for ''substantial additional growth''.

5.31 Barratt Redrow object to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified.

5.32 First of all, the Deposit Plan acknowledges that it performs a similar function to the Primary Settlements located within the Strategic Growth Area and it is described as one of the 'sustainable communities' in The Vale of Glamorgan

Key Characteristics section, as noted previously in Section 3.
5.33 Likewise, the site benefits from excellent accessibility the local public transport network, active travel routes and local services. These characteristics fully accord with Welsh Government's strategic objectives and emphasise the fact that Swn Y Coed constitutes an appropriate location for future housing.
5.34 With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge''. Barratt Redrow do not consider this to be sufficient justification to discount the site from allocation as there would be limited impact on BMW agricultural land arising from the development of Swn Y Coed.

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available.
5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.
Policy SP4 - Placemaking
5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.
5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.
5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.
5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.
5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
Policy PGD1 – Creating Well Designed and Inclusive Places
5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help

ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate

small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.
• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.
• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.
• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.
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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
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• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.

• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply
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• HG1 (8) St Athan - Clive Road, St Athan

Policy HG3 – Housing Led Redevelopment Opportunity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must

be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).
• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability

evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4).Finally, the Council's own Viability Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.
• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.
• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:
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Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:
i. Space heating demand less than or equal to 40kWh/m2/year;
ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.
• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.

• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
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Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established 'defensible' limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be 'largely shielded from view by woodland blocks/strips'.
• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for 'infilling' the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.

• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
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Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute “visitor pressure” or an “adverse impact” on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan’s ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
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Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.
• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties

and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
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MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
•
• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
•
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
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CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the Council's vision for the VoG.
• 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
• 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
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6. CONCLUSION
• Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.
• Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given

the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swn Y Coed, are necessary to ensure the RLDP is able to effectively meet
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Barratt Redrow welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Barratt Redrow support the requirements for affordable housing in new development. In its current form the proposed policies SP7 and SP8 lack sufficient flexibility for site specific circumstances and physical constraints which may impact upon delivery. This inevitably creates uncertainty for a number of sites, where the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities.
• From a planning perspective it is also important to recognise the additional benefits the site (Candidate Site Ref No. 437) could provide in accommodating the increased housing need generated by the suggested 15% flexibility allowance within a highly sustainable location. The principles of which clearly align with the Council's aspirations and would maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport

Change suggested by respondent:

It should be deleted or fundamentally amended to align fully with the national regulatory framework. Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP.

Sound: No

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3ch

7075 Support

Document Element: CC1 - Residential Operational Net Zero Carbon Development

Respondent: Barratt Redrow Homes [2669]

Agent: Highlight Planning

Summary:

Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of

onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider

employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."
The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.

5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.
In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP

on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply

base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.

Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part

Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.

The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.

That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.

There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.

The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.

In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.

Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part

Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.

The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.

In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest

needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.

8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.

The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.

Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:

• the Plan is overly reliant on a small number of key sites;

• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;

• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and

• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.

The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.

Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.

The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:

• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.

• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.

• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.

All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.

In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.

Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part

Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.

However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites

suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.
Policy CI1 – Open Space Provision
Position: Support in principle / Object in part
Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to

provide greater flexibility and to better reflect local context and design-led principles.
The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.
There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.
Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain

cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;

• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.

Countryside Impacts

The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.

The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.

Agricultural Land Quality

Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.

As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.

Appendix 2 – Summary of Assessment

We comment on the Council's Summary of Assessment as follows:

• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO_2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.

Suitability for Allocation and Key Benefits

For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.

The proposed development of the site would deliver the following key benefits:

• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;

• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7076 Object

Document Element: CC1 - Residential Operational Net Zero Carbon Development
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That

means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the

settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."
The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.
5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;

• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.

In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.

That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.

The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.

This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.

The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.

There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.

A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.

The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.

The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a

1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623

households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.

Policy SP6 – Flexibility, housing land supply and trajectory Position: Object

Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.

The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.

In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.

The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.

The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.

Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.

The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.

There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.

In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.

Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part

Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the

RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.
That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.
There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.
The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.
In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.
Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.
The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market

and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.

8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.

The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.

Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:

• the Plan is overly reliant on a small number of key sites;

• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;

• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and

• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.

The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.

Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.

The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:

• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.

• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.

• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.

All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.

In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.

Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part

Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.

However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.

Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.

The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.

We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever

more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.
Policy CI1 – Open Space Provision
Position: Support in principle / Object in part
Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.
The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.
There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the

principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.
Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites

containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.

Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment
We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.

I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7077 Comment

Document Element: CC1 - Residential Operational Net Zero Carbon Development

Respondent: Barratt Redrow Homes [2669]

Agent: Highlight Planning

Summary:

If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.

Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an

appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."
The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.
5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.
In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with

alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that

reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.
Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part
Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA

is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.
That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.
There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.
The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.
In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.
Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.
The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be “informed” by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council’s latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan’s blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.
8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part
Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.
The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan’s supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;

• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.
The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and

construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.
Policy CI1 – Open Space Provision
Position: Support in principle / Object in part
Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.
The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.
There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.
Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph

6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph
6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective

of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment

We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

Amend Policy CC1.

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7115 Object

Document Element: CC1 - Residential Operational Net Zero Carbon Development

Respondent: Barratt Redrow Homes [2669]

Agent: Turley

Summary:

Current Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across LPAs and may exceed what is necessary to align with national policy.

Full text:

Policy SP1 - Sustainable Growth Strategy

Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.

The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.

It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.

In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:

"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"

Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be concentrated is supported.

Policy SP2 - Settlement Hierarchy

The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable. As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Policy SP4 - Placemaking

We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.

The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses... ' or to be developed at 'high densities... and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.

Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:

"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have

already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Policy PGDl - Creating Well Designed and Inclusive Places
There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic

highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.
Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy Cll - Open Space Provision
The wording of Policy Cll, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy Cll should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy Cll requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at

Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7116 Comment

Document Element: CC1 - Residential Operational Net Zero Carbon Development
Respondent: Barratt Redrow Homes [2669]
Agent: Turley

Summary:

The policy should clarify that it applies only to regulated energy use.
If this policy is to be kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of the policy during the lifetime of the RLDP.
Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in the policy relate to the date of planning approval.
The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non-Material Amendment applications.

Full text:

Policy SP1 - Sustainable Growth Strategy
Policy SPl sets out that the plan will deliver 7,890 dwellings by 2036, including a minimum of 3,070 affordable homes. Policy SP1 also sets out that outside of the Strategic Growth Areas, the allocation of new sites will be limited to small-scale affordable housing led sites.
The number of households in VoG in mid-2021 (i.e. the start of the RLDP period) was 57,676. Based on Welsh Government's 2022-based household projections, the number of households is projected to increase to 67,299 in VoG in mid-2036 (i.e. the end of the RLDP period). This equates to a household increase of 9,623 which is 22.0% more than the 7,890 dwellings the RLDP targets in Policy SPl. In addition, the Development Plan Manual requires a conversion factor from households to dwellings with 4% being the baseline (it is acknowledged that this will vary depending on local circumstances). Taking a 4% uplift, the dwelling requirement figure would be 10,008 which is 26.8% more than the RLDP seeks to deliver in Policy SPl. The number of overall dwellings identified in Policy SPl will therefore not meet the identified household growth needs ofVoG for the RLDP period. The Council should review the position in terms of the updated household projections.
It is important to note that the above calculations are purely to meet newly arising need and do not make any allowance for existing unmet affordable housing needs or any policy aspirations. As stated in the supporting text of Sustainable

Growth Strategy 4 of the RLDP (paragraph 5.23) "The Local Housing Market Assessment (LHMA) 2023 identifies a need for 1,075 affordable homes per annum over the next five years based on principal projections or 1,114 based on the RLDP projections. There is an identified backlog of need across all the sub-market areas in the Vale of Glamorgan, and the issue is acute in many communities." Policy SPl seeks to deliver only 3,070 affordable homes over the RLDP period, equating to 205 affordable dwellings per annum. This is only 18.4% of identified need per annum for the five-year period from 2023-2028 in the LHMA. The number of affordable homes identified in Policy SPl therefore falls drastically short of the identified need for affordable homes in VoG for the RLDP period.
In order for Policy SPl to achieve the third test of soundness (Will the plan deliver?), the policy must be updated to accommodate a greater level of housing delivery, that reflects the most up to date evidence. The Development Plans Manual states:
"In terms of considering the level of housing provision for a plan, the most up-to- date suite of Welsh Government Population and Household Projections are a fundamental part of the evidence base [paragraph 5.35]"
Policy SP1 as drafted sets out that the allocation of new [housing] sites will be primarily focused within the Strategic Growth Areas (SGA) identified on the Key Diagram and outside of the SGA, the allocation of sites will be limited to small-scale affordable housing led sites. The identification of St Athan as a settlement where development should be concentrated is supported.

Policy SP2 - Settlement Hierarchy
The identification of St Athan as a 'Primary Settlement' is supported. It is important that sufficient growth is directed to the Primary Settlements to reflect the opportunities presented for delivering new homes, both market and affordable.
As recognised at Paragraph 6.11 of the Deposit Plan, St Athan is a key location for employment growth and also benefits from a range of services and facilities. This is also reflected in the Integrated Sustainability Appraisal (Paragraph 9.2.10), which recognises that locating new development in proximity to the Cardiff Airport and Bro Tathan Enterprise Zone will help integrate housing and employment, supporting sustainable travel and local labour markets. Future growth at St Athan will therefore support its role within the wider regional growth area, as well as existing and future transport proposals.

Policy SP4 - Placemaking
We support the recognition in Policy SP4 that successful placemaking can add social, economic, environmental and culture value to new development. Placemaking is an important part of all developments brought forward by Barratt Redrow.
The identification of high level placemaking principles in the Deposit Plan is supported, but a degree of flexibility should be applied. This is important to ensure the appropriate placemaking approach can be applied for each site / development. For example, it will not necessarily be appropriate for all developments to incorporate a 'diverse mix of uses... ' or to be developed at 'high densities... and supporting mixed uses'. Where developments are delivered on a phased basis, any mix of uses, residential densities etc may vary between each phase.
Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
"Placemaking Statements will be required as part of Design and Access Statements for all... " Paragraph 6.33, which supports Policy SP4 should also be amended. It is not appropriate to state that development will be 'favoured' where meaningful community involvement has been demonstrated. Taking allocated sites, significant consultation will have already taken place through the LDP process,
with further engagement required at the application stage through the PAC process. The RLDP should be amended to note that consultation will be 'encouraged' or similar.

Policy PGDl - Creating Well Designed and Inclusive Places
There is a degree of crossover and repetition between Policy PGDl and Policy SP4. For clarity and brevity of the Plan, a single policy could be taken forward.

Policy PGD2 - Residential Site Densities
It is noted that the minimum density sought for sites within the Key, Service Centre and Primary Settlements is higher than that currently required by the adopted LDP. It is important that flexibility is adopted where proposed allocations in the RLDP crossover with existing LDP allocations.

This is relevant to Church Farm, St Athan, which is allocated in the adopted LDP. The Deposit Plan retains this allocation, but also proposes a further phase of development to the east (through Policy HGl KS4). A planning application is currently being prepared for the first phase of development (relating to the existing allocation), which accords with the adopted LDP requirement of 30 dph. The RLDP should recognise that flexibility will be required where sites are delivered on a phased basis, with earlier phases also being identified in the adopted LDP.

The inclusion of caveats recognising that lower residential densities can, in some cases, be acceptable is welcomed. It is important that the characteristics of each site/ surrounding context can be taken into account, along with sites constraints and other technical requirements (such as SuDS).

Policy SP6 - Housing Requirement
Policy SP6 currently includes a flexibility allowance of 10%. The provision of a flexibility allowance is supported, but it should be increased to 15%. The Development Plan Manual 3 indicates that 10% should be the starting point. This would

be consistent with a number of other adopted and emerging LDPs, which have been based on allowance above the standard 10% (e.g. adopted Bridgend LDP at 14% and emerging Monmouthshire LDP at 15%). A higher figure is considered appropriate due to the low level of new allocations, the limited number of key sites allocated in the plan and the need to increase the level of required growth (as referred to in our response to Policy SPl).

The number of homes delivered through new allocations should be increased to make the Plan more ambitious and align with Future Wales and the Vale's identified role as a National Growth Area.

Policy HSI - Housing Allocations
We support the identification of Church Farm, St Athan as a 'Key Site'.

The table within Policy HG1 should be amended to make it clear that the number of units listed for each site are approximate figures, allowing a degree of flexibility.

Policy HG1 KS4 - Land at Church Farm, St Athan
Paragraph 6.96 rightly acknowledges that the allocation will be delivered on a phased basis. With the first phase (the western parcel), representing land allocated through the adopted LDP. A hybrid planning application is due to be submitted in March 2026 for this phase of development. The application proposes 232 new homes and a new Class Al foodstore - as per Paragraph 6.99 of the Deposit Plan.
Paragraph 6.102 states that there is limited capacity in West Aberthaw Waste Water Treatment Works (WwTW). It continues by stating that if the development wishes to connect in advance of the planned AMP scheme, a Developer Impact Assessment to establish the reinforcement works needed at the WwTW will be required. It should be recognised in the Deposit Plan that this applies to the wider allocation, with sufficient capacity existing for the first phase of development.
Policy HG1 KS4 should be amended to read that the site will deliver "approximately 532 homes over the plan period... ".
The policy requires the development to comply with the Placemaking Principles set out in Policy SP4. This policy has been commented on separately, but as previously noted, it is important that the phased nature of the Church Farm development is recognised when applying the placemaking principles. As a result, there may be slight differences in what is appropriate across each phase.
The policy currently requires affordable dwellings to be dispersed across the site in clusters of not more than 10. This should be amended to clusters of no more than 15 units.
Policy HG1 KS4 also sets out a number of other requirements that the development "must" comply with. We do not support the current wording and use of "must comply with". Some of the requirements listed will require further consideration during the design development of the scheme. This will be supported by detailed technical work to be prepared in support of a future planning application. The wording should be amended to reflect that the list 'requirements' will be subject to further consideration, and should not be treated as definitive.
For example, the points listed under 'Sustainable Transport and Highways' should be informed by a Transport Assessment. This is reflected in Background Paper BP44 (Infrastructure Delivery Plan), which recognises that contributions towards off-site improvements to the capacity/ flow of junctions will be determined through a site-specific Transport Assessment.
The first bullet point under Policy HGl KS4 should be amended to read:
"A proportionate contribution towards off-site improvements to the capacity and flow of junctions on the strategic highway network, if identified as being necessary by a site-specific Transport Assessment". As per Policy HGl KS4, the first phase of development at Church Farm has been developed on the basis of an access point from Gileston Road. This is as per the request from the Highway Authority. The hybrid planning application will also deliver localised road widening on Gileston Road and provision of a new active travel route.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
The third bullet point under the 'Sustainable Transport and Highways' heading should be amended. Transport work undertaken to date has demonstrated that there is no need for a new signalised junction at Gileston Road/ B4265. The need for and nature of any work required to this junction should be determined through the planning application process, informed by a Transport Assessment. It is therefore not appropriate for the Policy to state that an upgraded signalised junction 'must' be provided. The intention is for a second access point to be provided for the second phase of development from the B4265. This is in line with the access strategy requested by the Highway Authority. The form and nature of this access point will be agreed through the planning application process, informed by a Transport Assessment.
The hybrid planning application for the first phase makes provision for a new pedestrian and vehicular access to St Athan Primary School. Whilst the developer can make provision for such a link, it will be down to the Highway Authority and Education Department to determine whether it is provided. Policy HGl KS4 should be amended to reflect that it is not within the developers gift to guarantee the link is taken up, delivered or actually 'replace' the existing access on Rock Road. At the moment is unclear what type of access could be sought (e.g. pedestrian and / or vehicular) and whether this would solely be through Phase 1 (as indicated by Figure 16).
Upgrades to existing bus infrastructure is expected to be delivery through planning obligations. Again, the nature of any improvements will be determined through the planning application process.
The Policy sets out a number of requirements relating to 'Community Infrastructure'. This includes the transfer of land to the east of St Athan Primary School and an off-site contribution towards the delivery of additional school places. No detail is provided as to the quantum ofland expected to be transferred. It is also noted that Policy CI3 states that land 'may be' required.

Whilst the principle of transferring land for the redevelopment I expansion of St Athan Primary School would be considered in principle by BWD, further information will be required to consider this request in full. As it stands, no information has been provided as to the extent ofland required. It is also important that Policy HG1 KS4 recognises that the need to provide for/ contribute towards education facilities will need to be determined at the point of any future planning application.
If a land transfer is required and agreed as part of the second phase of development at Church Farm, this must be reflected in any request for off-site contributions. Background Paper 44 (Infrastructure Delivery Plan) states that the second phase of development will require the transfer ofland, or a Section 106 contribution of £5.8 million. The basis and justification for this sum of contribution is not detailed within the Plan or supporting documents. Full details will need to be provided and considered at the planning application stage.

(continued) Policy HG1 KS4 - Land at Church Farm, St Athan
Policy HG1 KS4 also identifies the need for a contribution towards the provision and enhancement of community facilities in the area, and a contribution towards training and development for the commercial element of Phase 1. Whilst the principle of providing a community facilities contribution is accepted, evidence of need for such a contribution will be required at the planning application stage. The Policy should also be amended to recognise that training and development could either be provided a contribution or as part of the development itself.
The need to respect the setting of the listed War Memorial is reflected in the hybrid planning application due to be submitted imminently for Phase 1. The scheme has been carefully designed, with the relocation of the proposed foodstore to the northwest corner of the site, setting housing back from the B4265 and realignment of the central green corridor.
The importance of green infrastructure, recreation spaces and biodiversity is recognised and supported. Land at Church Farm offers the opportunity to deliver high-quality landscape buffers, accessible green space, integrated SuDS features and pedestrian and cycle connectivity with the village of St Athan and the wider strategic active travel route.
It is important that the Policy is not overly prescriptive about the types of green infrastructure and open spaces to be provided, which could potentially constrain the ability to deliver a design and landscape led masterplan. Instead, the policy should focus on outcome-based placemaking principles and flexibility in how these outcomes are achieved through design. It is also important that the ability to provide GI and open space across the site reflects other policy requirements, such as the delivery of SuDS.
The Deposit Plan includes an indicative plan for Church Farm at Figure 16. Whilst referred to as 'indicative', the purpose and status of this plan should be made clear in the supporting text. It should only be treated as illustrative, with the final development for Phase 1 and 2 being subject to further detailed design and technical work. For example, it is noted that within the Phase 1 development, land identified as 'Significant POS' on the plan is actually intended to accommodate the main attenuation basin. Whilst it would serve a qualitative purpose, it would not act as POS per se.

Policy SP7 - Affordable Housing Provision

The provision of a range of tenures, types and sizes of affordable homes is supported in principle. This should be assessed on a site by site basis at the application stage, with the LHMA being a starting point for discussions with the Housing Strategy Service. This flexibility will ensure that the most appropriate mix of dwellings is brought forward based on factors such as site characteristics, local context, placemaking etc.

It is also important that Policy SP7 acknowledges that affordable housing provision should also consider the evidenced viability of a development. This would be consistent with Policy SPS.

Policy SP8 - Affordable Housing Requirements

Recognition that the provision of affordable housing should be negotiated on a site by basis, considering the evidenced viability of a development, is supported. Recognition that the exact mix of affordable housing will need to be considered on a case-by-case basis is also welcomed. This is important to ensure sufficient flexibility when discussing the most appropriate mix of affordable homes at the application stage.

Policy TRI - Transport Proposals
Policy TRI states that to mitigate the impact of development on the highway network, strategic highway improvements have been identified to the Gileston Road junction in St Athan. As per our comments under Policy HG I KS4, the need, and nature of any works to the Gileston Road / B4265 junction must be informed by detailed technical work.

We can confirm that the first phase of development, which will be subject to a hybrid planning application in March 2026, has been designed to not prejudice any future improvement works to the junction (should measures be demonstrated as necessary in the future).

Policy SP12 - Retail Floorspace Provision
The identification of new convenience floorspace at Church Farm, St Athan is supported. The provision of new retail floorspace in this location will support the existing and future population of St Athan, reducing the need to travel to other settlements to serve their needs.

Policy SP13 - Community Infrastructure and Planning Obligations.
We support the recognition in Policy SP13 that any requirement for planning obligations must be appropriate and have

regard for development viability.
Policy SP13 also states that the delivery of new/ improved infrastructure should be timed to meet the needs of communities prior to, or from the commencement of, relevant phases of development. It must be recognised in the policy or supporting text that the delivery / timing of some infrastructure measures will be outside the control of developers I developments. This is particularly the case where financial contributions are made and measures will be delivered by others. Flexibility should therefore be allowed for through Policy SP13.

Policy Cll - Open Space Provision
The wording of Policy Cll, and/ or the supporting text, must allow greater flexibility to be applied to the open space standards. This is essential to ensure that the spaces provided are design, rather than standards led. It is also important that the type and range of provision is reflective oflocal context/ needs. This is reflected in Paragraph 6.233 of the Deposit Plan but Policy Cll should also be amended to reference this directly.

The proposed 62.2 sq m per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy requirements of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
The recognition that in some instances off-site contributions will be appropriate in lieu of on-site provision is welcomed.

Policy Cll requires an 'Open Space Strategy' to be submitted for all housing developments that meet the relevant thresholds. In many instances, the provision of open space within a scheme will be addressed through a Design and Access Statement and/ or Green Infrastructure. This ensures that open space provision is considered as part of the comprehensive approach to design, landscape and biodiversity. We would question the need for a standalone strategy or statement. The Policy should be amended to reflect this.

Policy CI3 - New Community Facilities
Policy CI3 identifies the 'allocation' ofland at St Athan Primary School for new community facilities. The supporting text (Paragraph 6.245) confirms that this land is allocated for the redevelopment and expansion of the existing school site. It continues by stating that a "small area of additional land may be required required ... to facilitate the delivery of the school" as part of the Key Site allocation at Church Farm. It states that improved access "may also be necessary".

As worded, the Policy is not clear what land is allocated - whether it is actually within the Primary School and/ or adjoining land. Ifland may be required within the Church Farm development (as implied by Policy HG1 KS4), it is currently unclear what quantum ofland would be sought. Whilst the principle of transferring land for expansion of the school (as part of Church Farm Phase 2) and facilitating improved access would be considered by BDW, it is important that what is being sought is clear.

It is important that there is coordination between policies in the Plan - for example, Policy CI3 and Policy HG1 KS4. This should include an amendment to Policy HG1 KS4 that the land 'may' be required, rather than must be provided. It is also important that ifland is provided for the school expansion, or improved access is facilitated, by the development at Church Farm, this is reflected in other requirements and expectations across the Plan (e.g. in terms of design, planning obligations etc).

Policy CCI - Residential Operational Net Zero Carbon Development
Current Building Regulations targets are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy.

The policy should clarify that it applies only to regulated energy use. Developers have no control over how future homeowners use their homes, and therefore unregulated energy consumption such as appliance use, occupant behaviour, and plug loads, cannot form part of compliance requirements. This is consistent with Building Regulations methodology

Alternatively, if Policy CCI is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CCI to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CCI during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CCI relate to the date of planning approval.
Furthermore, the demands of Policy CCI have to be considered in the context of all of the other requirements that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HGI, can bear the cumulative policy costs of the RLDP, including Policy CCL

The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect

site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

Change suggested by respondent:

Amend policy wording.

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xs

7199 Comment

Document Element: CC1 - Residential Operational Net Zero Carbon Development

Respondent: H Jones, L Sungur and P John [3741]

Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included.

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis. Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

The inclusion of the site within the settlement boundary is logical especially when viewed in the context of the linear settlement of Fferm Goch. In addition the site is further suited to development allocation as the northern and southern boundaries are built up and the main road runs along the eastern boundary. A flexible approach is encouraged with regard to the delivery of the dwellings in relation to a variety of factors and policy provisions including the housing needs across the Vale, the limit on numbers of rural affordable led sites in minor rural settlements, viability implications relating to obligations/carbon Zero and sustainability obligations and the potential to extend the allocation if the need for homes requires.

The 3 land owners remain committed to this development and local developers are waiting to deliver the allocation.

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

The test of soundness for a Local Development Plan (LDP) is a critical component of the planning process to ensure that the plan is prepared in accordance with legal and procedural
requirements. It involves demonstrating that the plan is 'sound' based on three tests set out by the Welsh Government in the Development Plans Manual (Edition 3). These tests have therefore been considered in our representation, the tests include:

• Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)
• Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
• Test 3: Will the plan deliver (i.e. is it likely to be effective?)

SP1 – Sustainable Growth Strategy

The promotion of small scale affordable housing led development outside of the SGA, as proposed by SP1 is important as this provides essential affordable and market homes in the rural locations of the Vale as well as the SGA. Their provision is critical in meeting the area's housing needs, particularly affordable dwellings and supporting rural community stability, and ensuring that all parts of the Vale remain a place where people of all incomes are able to live and thrive during the plan period to 2036 and beyond.

The essence of Policy SP1 is supported, however it is well documented that there is a backlog in delivery of affordable homes and the need for affordable housing in the Vale is exacerbated by the high prevalence of single person households plus households comprising couples with no children, The Vale also has one of the highest affordability pressures in Wales. As stated in the 2023 Local Housing Market Assessment (LHMA) for the Vale of Glamorgan , the median house price in the Vale is around 8 times the median household income, well above the affordability threshold of 4.5 to 5 times household income for borrowing purposes. Private rents have also risen sharply in the area, commonly placing them out of reach for many low-to-middle income households. All of the above place further pressure on the need to deliver affordable homes in the locality.

The LHMA identifies a need for 1,075 affordable homes per year over the next 5 years based on principal projections (or 1,114 based on the RLDP projections). As mentioned previously past delivery rates fall significantly short and therefore a backlog is present, however despite the reported backlog the RLDP only proposes 3,070 (205/annum) affordable dwellings over the plan period to 2036. Despite the growth strategy of policy SP1 and allocations made through the RLDP, the figure of proposed affordable dwelling numbers is concerning as it falls significantly short of the demand evidenced within the most recent evidence of LHMA of 2023.

The housing figures quoted in SP1 indicate 7,890 dwellings (including the 3,070 affordable dwellings) to 2036, however these figures overall are inadequate over the plan period when considered against the 2022 WG household projections. The 2022-based household projections provide an indication of the future number of households, and their composition, based on population projections and assumptions about households from recent censuses. The vale of Glamorgan demonstrates an increase of almost 12% in the number of households between mid-2022 and mid-2032; note this is the highest percentage increase by Local authority in Wales and way above the average for Wales as a whole (that stands at around 7% increase). The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both open market, but particularly Affordable) development across the Vale.

Without targeted allocations outside of the SGA, as outlined in Policy SP1, the gap described above will continue to widen, forcing more residents to leave the area and weakening community cohesion.

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as ‘Minor Rural Settlements’. Within the
RLDP the supporting text of Policy SP2 states:
‘several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate’.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale’s own strategic objectives for

sustainable growth. Locating affordable-led developments in areas with existing infrastructure such as primary schools will reduce car dependency, lower carbon emissions, and contribute to the Council’s climate change commitments.

Considering the above, the limit on small scale rural affordable housing led developments (RAHLD) to 25 for these settlements is questioned and further flexibility recommended on a case by case basis. It is understood the limit on numbers was imposed due to the existing scale of the settlement in which the RAHLD are located, however those allocations will only likely deliver at 50% affordable and therefore only provide 12.5 (or 13) affordable units as a maximum (note Fferm Goch would provide 11 affordable dwellings on current figures of 22 total dwellings). Given the concerns raised in response to Policy SP1 there remains an issue of whether the numbers proposed in the RLDP can meet the demonstrable need for affordable homes and if there is scope on a RAHLD to sensitively increase unit numbers without any material harm then the policy should be flexible to accommodate this.

Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the range of facilities and services provided in these settlements. It is also supported that these settlements are able to provide affordable led residential development of up to 50 dwellings (delivering 25 affordable units). However the provision of an increased number of units in the Primary Non SGA settlements must not be at the expense of a wider number of smaller rural sites with the ability to sustain smaller communities across the Vale, especially given the shortfall in numbers as outlined above.

PGD2 – Residential Development Densities

The best use of finite land is set out in PPW and consistent with the setting of the densities as prescribed in policy PGD2. The policy is considered to meet the 3 tests of soundness.

The approach of policy PGD2 is also supported through the proposed density of the site North of Westwinds business park, Fferm Goch in HG4 (4). This allocation that proposes to provide a density of just over 30/ha within Fferm Goch, a minor rural settlement.

SP6 – Housing Requirement

Affordable housing forms an important part of the housing requirement figures of Policy SP6. Whilst the total 122 dwellings proposed under policy HG4 is a relatively small contribution to the overall figures it provides important spatial distribution of homes across the Vale within the rural area.

Given the concerns raised with regard to Policy SP1 there is fear that the affordable housing numbers will not be sufficient to meet need. The site north of Westwinds business park, Fferm Goch has the ability to expand to the south (as per the CS Ref 398) in order to accommodate additional dwellings (both market and affordable dwellings in order to sustain the viability of the site).

SP7 – Affordable Housing Provision

In accordance with Policy SP7 the allocated site HG4(4) at Fferm Goch provides a range of tenures, types and sizes in response to the LHMA, waiting list data and Older persons housing strategy in order to provide for 11 dwelling units and contributing toward the 3,070 affordable requirement to 2036. Changes in the household composition mean more single person and small homes are required, plus older person accommodation for those wishing to downsize and stay in the area.

Please see comments for Policy SP1 / Policy SP2 above regards concern over the proposed housing numbers and supply of affordable homes against demand - this therefore brings the Deliverability of the plan in to question (Test of Soundness 3).

SP8 – Affordable Housing Requirements

Policy SP8 is supported in so far as contributing much needed affordable housing development commensurate with the size of the settlement in which it sits. We are encourage to see reference to the provision of affordable housing to be negotiated on a site by site basis considering evidenced viability fo the development.

The affordable dwellings proposed foster stability in rural areas by allowing a range of households (from single person to growing families) to stay in their local area.

Policy SP8 states 40% affordable for those developments in primary and minor settlements outside of the SGA yet 50% requirement on affordable housing led allocations in minor rural settlements (also outside of the SGA). This appears inconsistent and penalising those smaller rural sites that will already be more delicately balanced in viability terms by virtue of their limited size of 25 units. Further viability issues covered in other policies (such as SP20, relating to biodiversity, Net Zero and sustainability credentials must (with the required evidence submitted and assessed by the council as stated in Policy SP8) be flexibly reviewed to ensure sites are viable and deliverable as recognised by the Council, there is a danger the stringent requirements, especially for smaller sites, could render those sites unviable in the current climate with rising build costs.

HG4 – Rural affordable housing led sites

The allocation of land north of West Winds Business Park under policy HG4(4) for rural affordable housing led development of 22 units is strongly supported. Then allocation will assist in delivering homes in the rural Vale and contribute to the important stability to the settlement of Fferm Goch to 2036.

The extension of the settlement limit including the site north of West Winds Business Park is supported. The site provides an obvious infill to the small break in the built up area to both the north and south of the site, with the main road running to the eastern boundary of the site.

The inclusion of the site within the settlement of Fferm Goch is logical and in harmony with the existing linear settlement.

The proposal supports the aims of the Local Development Plan and the Welsh Government's commitment to increasing affordable housing supply. By providing for affordable led allocations the policy aligns with the Well-being of Future Generations (Wales) Act 2015 in aiming to promote a healthier, more equal, and cohesive community.

There is concern however surrounding the number of dwellings proposed and if the Plan seeks sufficient dwellings and affordable provision given the predicted need to 2036 shown in the LMHA.

SP13 – Community infrastructure and planning obligations

Policy SP13 demonstrates the importance of community infrastructure in sustaining both the residents well being and economic growth of an area. See also the response to Policy SP2 that refers to the allocation of housing in the rural areas specifically supporting those settlements with local primary school provision.

The viability of developments however must not be compromised in order to ensure delivery of the plan. To see in Policy SP13 that 'development viability' is recognised as a key factor in delivering community infrastructure under planning obligations, is supported. It is recommended that this recognition is replicated in other policies of the LDP in order that the third Test of soundness can be fully met; Deliverability – ensuring the plan is likely to be effective). See comments in relation to Policies SP8/CC1/SP16/CI1.

CI1 – Open Space Provision

Provision of open space in residential developments is supported. HG4(4) promotes open space within the draft allocation.

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

The provisions of SP16 are generally supported as practical measures to ensure important sustainable development is achieved.

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

Provision of Green Infrastructure in residential, and all developments is supported.

HG4(4) retains and enhances existing and will promote green infrastructure on the draft allocation.

The viability of developments however must not be compromised through green infrastructure provision - in order to ensure delivery of the plan. The 'development viability' should therefore be recognised as a key factor in delivering Green Infrastructure. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

Fferm Goch is one of the settlements that remains fully within and covered by the Upper and Lower Thaw Valley Special Landscape Area (SLA). It is noted that in such settlements, while there have been amendments to the identified settlement boundary (inclusion of HG4 (4) rural affordable led housing allocation) this has not affected the SLA designation in these areas. (Background Paper 45; Paragraph 1.16 refers).

The location of the small allocated site HG4(4) is nestled within the settlement of Fferm Goch. It is built up on both the northern and southern boundaries, with the main road running along the eastern boundary. There is no unacceptable harm to the SLA of the Upper and Lower Thaw valley.

The allocation of the site for residential development does not give rise to unacceptable harm to the special qualities and characteristics of the SLA, based on LANDMAP information, continues to be preserved.

Change suggested by respondent:

-

Sound: Not specified

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

7214 Support

Document Element: CC1 - Residential Operational Net Zero Carbon Development

Respondent: Penarth Town Council (Mr Pete Newton, Principal Policy, Innovation and Development Officer) [1125]

Summary:

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Full text:

Penarth Town Council Deposit RLDP Consultation Response

Comments collated at a meeting of the Council's Consultation Task and Finish Group on 9th February 2026

Some Members attended the RLDP consultation drop-in session in Penarth and in general found it to be very informative.

Members support the general development strategy but did note the lack of information concerning discussions with adjacent and other nearby Principal Councils in the CJC Region. In view of the forthcoming Strategic Development Plan, encompassing the ten authorities, members felt that some further commentary regarding this is warranted.1

It is clear that the approach taken in the Cardiff paper is still that ideally, each Council is self-contained and "consumes its own smoke," which does not show any wider strategic thinking between the ten authorities in preparation for a regional Strategic Development Plan.

Members agreed with the view that infrastructure to support new housing developments was required in order to create successful developments, although they acknowledged that logistically it was difficult to pre-empt demand for some services such as travel and health services. Members also noted that predicting developmental needs and opportunities within wider context surrounding the UK's economic, political, and social landscapes.

Members noted that there was not much focus on Penarth or identified potential future development for Penarth beyond that already underway at the location near to Cosmeston but welcomed flexibility in its approach. Members expected to be more closely involved in the decisions and planning of this, and other such developments, and provide opportunity for wider consultation where appropriate, such as pre-application consultations, as well as would expect to be included in consultations concerning sites adjacent to Llandough, Dinas Powys, and Sully given their impact upon the town.

Penarth as a town is currently developed to its boundaries, save for the development at Cosmeston. It is, therefore, more dependent than other Service Centres on windfalls of land or buildings which may arise during the currency of the Plan. In 2023, an extensive assessment of the potential of the town concluded the following:

"There is marginally less capacity in Penarth [and Llandough] than the projected figures. However, this does not mean that the projections are incorrect or unjustifiable. The reported figures have not included a significant amount of capacity on open space land, and the projected figures for conversion of existing buildings and intensifications will be surpassed if the extant consents that exist this early in the Plan period are implemented."

The degree of flexibility, however, is substantially depending on one large site. P009, Headland School, is identified as both a potentially disused building and as a site with a capacity of 111-120 units. This special school is full to capacity and used by many Council in both Wales and England.

Members did note the inclusion of Cogan Transport Interchange under section 6.196 but would have liked to see more information about its future developments as they see it as key to increasing public transport use to Barry and further to West Wales in general.

Members wished to advise that issues with both the bridge and the platforms at Cogan have been long term, with accessibility being central to these issues. Members felt that improvements to accessibility should be a priority at this site, with planting and landscaping considered secondary to this.

Members felt it was key to consider the additional stress on Penarth from increased anticipated demand of public transport needs and emphasised the need for this to be aptly considered by bus route providers as part of development work.

Members wanted to see a strategy that actively protects the town's heritage and culture whilst still being able to provide for current and future generations.

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16 and section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report2, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Under CC2, it was noted that the presumption against demolition3 in favour of retrofit and reuse may constrain maximum transition to net zero as, whilst there is grant aid available for public buildings and social housing, the retrofit monies available for private stock is limited.

Additional considerations will also need to be made as part of the Third Carbon Budget (2026-2030), Local Area Energy Plans and the climate change ISA theme.

Members also felt similar about the inclusion and consideration of sustainable development through the specific strategy outlined in section 5 of the document and felt this linked in well with ongoing Placemaking work and its strategic approach as detailed in SP4.

Members were pleased to see mention of the diversification of high streets, although noted that Penarth was above average in terms of occupancy. They hoped that the RLDP would be able to support the town centre and support other ways it could be improved, such as a fishmonger or identifying a site for a new Cemetery.

With Penarth classified as a Service Centre, they are identified as having a defined role. However, the decline of in-person retailing means that defining role is not that evident, and Members felt there is potentially a need to move away from the traditional retail role of Town Centres in favour of "repurposing, creating multifunctional, commercial, and service centres that meet the needs of the communities they serve" in line with Future Wales Town Centre First Policy. The term 'repurposing' suggests a stronger role for the public sector in enabling these new purposes, and Members felt that Placemaking Plans could be one potential framework for this.

Members felt that potential functional support that could be provided could include:
• The appointment of a Town Centre Manager
• Using supporting interventions such as an extension or reshaping of normal services such as Neighbourhood Services.
• Using existing or emerging new powers, such as compulsory purchases.

Members wished for the RLDP to facilitate the safeguarding of essential public services, including health, policing, fire and rescue in the town, which would help to develop the defining role of a Service Centre, and felt that specific reference to these would be beneficial.

Members supported the avoidance of coalescence with adjacent settlements through the reconfirmation of Green Wedges as it allows for relevant extensions to those settlements whilst allowing them to retain their identity.

Members noted that the Quiet Area provision under DNP6 only applies to Penarth and wished to know why this was the case.

Members advised that they welcomed further opportunity for consultation, particularly in relation to developments in the neighbouring Cardiff Bay area whilst acknowledging that this is not necessarily an RLDP concern.

Footnotes

1 There is an evidence paper concerning relations with Cardiff and a Statement of Common Ground with Bridgend. However, there is only a reference in the RLDP text to discussions with other regional Councils and not the paper itself. We would be grateful if you could provide the paper as it does impact on the soundness of this Plan.

2The UK Climate Change Committee's 'Progress Report: Reducing Emissions in Wales' highlighted the following aspects of import: Skills, Vehicle Charging Networks, Improving Recycling, Energy Plans, Decarbonising Public Buildings and Social Housing, and reducing Road transport Demand (Car-Kilometres).

3The UK Environmental Audit Committee (2022) noted that "the evidence we received consistently recommended that retrofit and reuse be prioritised over new build."

Change suggested by respondent:

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Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3d5

4624 Object

Document Element: CC2 - Presumption Against Demolition

Respondent: Mr David Barton [2683]

Summary:

Avoidable decline by demolishers should be compiled into a watchlist seeking to exploit house building targets for profit when they disregard restoring a building and repurposing it to show off to their social groups.

Full text:

Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.

Avoidable decline by demolishers should be compiled into a watchlist seeking to exploit house building targets for profit when they disregard restoring a building and repurposing it to show off to their social groups.

Change suggested by respondent:

as above with protections for listed, non-designated heritage assets and unclassified buildings alike altogether.

Sound: No

Attachments: None

5946 Object

Document Element: CC2 - Presumption Against Demolition

Respondent: HBF (Mr Mark Harris) [538]

Summary:

This policy should be removed, as it is likely to lead to lower-density development and reduce the level of windfalls achieved.

Full text:

A presumption against demolition is considered onerous and unnecessary and is not supported by national policy.

HBF also questions how this policy will impact the level of windfall sites that will be delivered by the plan. Windfall allowances are based on past build rates; the previous plan did not have a similar policy, so brownfield windfall sites will have been more likely to have delivered a higher number of units as a result of site demolition and clearance before redevelopment.

The HBF notes that several sites identified in the Council's BP19 Urban Capacity Study have existing buildings on them; however, no mention is made of how a presumption against demolition might affect their delivery capacity.

This policy adds additional burden on SME developers, who are more likely to develop windfall and brownfield sites with existing buildings, with yet more reports required as part of a planning application.

HBF suggests that adequate wording is already provided at point 2 of Policy SP16 - CLIMATE CHANGE MITIGATION AND ADAPTATION.

Change suggested by respondent:

Policy should be deleted.

Sound: Yes

Attachments: None

6048 Object

Document Element: CC2 - Presumption Against Demolition
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:
As drafted, Policy CC2 sets a presumption against demolition. This could have serious impacts on delivery timescales for residential sites with, for example, unused or derelict farm buildings or where a dwelling needs to be demolished for access purposes. This could have implications on the housing delivery trajectory as set out in the Council's Housing Land Supply and Housing Trajectory Evidence Paper.

Full text:
As drafted, Policy CC2 sets a presumption against demolition. This could have serious impacts on delivery timescales for residential sites with, for example, unused or derelict farm buildings or where a dwelling needs to be demolished for access purposes. This could have implications on the housing delivery trajectory as set out in the Council's Housing Land Supply and Housing Trajectory Evidence Paper.

Change suggested by respondent:
Policy CC2 as drafted therefore risks not achieving the third test of soundness (Will the Plan deliver?) and Policy CC2 should therefore be removed from the RLDP

Sound: No
Attachments: None

6081 Object

Document Element: CC2 - Presumption Against Demolition
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:
As drafted, Policy CC2 sets a presumption against demolition. This could have serious impacts on delivery timescales for residential sites with, for example, unused or derelict farm buildings or where a dwelling needs to be demolished for access purposes. This could have implications on the housing delivery trajectory as set out in the Council's Housing Land Supply and Housing Trajectory Evidence Paper.

Full text:
As drafted, Policy CC2 sets a presumption against demolition. This could have serious impacts on delivery timescales for residential sites with, for example, unused or derelict farm buildings or where a dwelling needs to be demolished for access purposes. This could have implications on the housing delivery trajectory as set out in the Council's Housing Land Supply and Housing Trajectory Evidence Paper.

Change suggested by respondent:
Policy CC2 as drafted therefore risks not achieving the third test of soundness (Will the Plan deliver?) and Policy CC2 should therefore be removed from the RLDP.

Sound: No
Attachments: None

6599 Comment

Document Element: CC2 - Presumption Against Demolition
Respondent: Mr David Barton [2683]

Summary:
Non-demolition of historic buildings prior to the 1950s must be made policy or adhered to as part of the Council's commitment to combatting the Climate Crisis through sequestering carbon in its Old Builds.

Where demolition is proposed for 1950s style housing onwards- any new construction must be in the historic building style and local materials to ensure high carbon capacity, quality aesthetic and true blending of the interconnected conurbations of any one area, place or location.

Pleased to note that LAs broadly acknowledge and grasp this concept therefore the aim should be to increase the net number of carbon-rich Old Builds long-term through support packages that will combat the Climate Crisis, provide economic benefit and improve Conservation in a pioneering fashion that may draw wider funding opportunities for the area.

Full text:
Context:
This consultation feedback submission has been produced by Mr. David Richard Barton, also known as Community

Campaigner David Barton who is promoting both the existing Built Historic Environment and Traditional Vernacular Architecture (TVA)/ Traditional Architecture (TA) as a key feature across UK and Ireland-wide Local Authorities and associated Planning Departments at all tiers of Local, Regional and Central Government.
This universal consultation therefore acts as an official Representation at all and any stage of official area UK Planning Consultations- Preliminary Scoping Documents, Named Stages of the Local Plan, Conservation Area Appraisals and Supplementary Planning Documents (SPDs), primarily regarding Design Codes.
Representations are being made by Mr. Barton as part of his ongoing work to champion the key stakeholders at various key areas old and new with a view to supporting their economic growth through the merits of High-Quality style Conservation with the hope of encouraging wider constructive and restorative support through positive and constructive working.
It is submitted that TVA should play a key part in any and all policy moving forwards on the grounds of conferring practical benefits be these periodic maintenance, their perceived support from the public, their invaluable contribution to achieving Climate Crisis Targets set local, nationally and internationally alongside their overall cost-effectiveness to key stakeholders alike in terms of Planning and sourcing of raw materials.
*One primary document that should be considered with significance especially alongside my own representation is a written academic account of the actual practicalities associated with Traditional Architecture from a leading expert in their field.i.) Not only does this in-depth analysis provide an in-depth take on the widely assorted merits of this type of Architecture but it fully corroborates my case made across all sections typically found in one of the consultations highlighted above.
Furthermore, my representations to date and contained herein this document are duly supported by the Founder and Director of The Institute for Traditional Architectureii.) who has identified and recognised my own contribution(s) to communities up and down the Sefton Borough. This is an internationally acclaimed organisation which periodically works with other leading agencies and organisations to bring about effective positive change.
Outlined throughout Submission are responses to existing Consultations which set out why I consider amendments to existing Planning Policy documents are necessary to ensure the best possible outcomes.
References to supporting documents are contained in the indented blue numbering.
This Submission has been prepared for UK and Ireland-wide Local Authorities in the hope that it may serve as an umbrella representation by Mr. Barton. This does not prejudice his ability to also comment on live stages of any one Consultation, merely providing the ability to be put in touch directly with any one Local Authority in receipt of this Representation with the prospect of also taking part in any version(s) of Consultations begin ran by said Local Authorities. If there are future consultations, especially regarding Design Codes and SPDs relating to this across both designated and non-designated heritage assets then it is hoped that these are duly provided to Community Campaigner David Barton.
Mr. Barton has cited material references and sources from his previous Representation to the Bootle Area Action Plan Consultation (2021-2026) that align with his existing and ongoing points which he would like to raise in parallel with other Local Authorities. Where a more detailed discussion with leading sources, such as Architects and Academics may prove conducive with these Councils then Mr. Barton would be delighted to discuss this further.
Community Campaigner David Barton:
Community Campaigner David Barton is a Heritage Campaigner of over 11 years' experience who has championed and led a number of successful campaigns to promote TVA in modern-day life. His dual mandate is to provide effective (alternative) use of historical buildings encompassing a full restoration alongside achieving the mainstream construction of new classical architecture on numerous economic, environmental and ecological grounds that align with existing policy set out by Central Government covering the UK and increasingly elsewhere across the world.
Having worked with a wide array of residents, businesses and organisations in that time, which has included the full restoration of the Victorian Verandahs on Lord Street, Southport in tandem with the respective key stakeholders and other property owners to prevent demolition of Old Builds across Sefton, Mr. Barton is now hoping to make the process of utilising the built environment to its fullest potential a far simpler one that will enable Bootle to fully reach its maximum potential as a historic town.
SECTION 1: Design Codes:-
1. Design Codes based on TVA should be utilised in preference to Design Guides
2. LAs should establish recurring partnerships with key Consultation Bodies, such as Create Streets and The King's Foundation, etc who specialise in getting through to a huge swathe of grassroots members of the public with tried and tested previous experience in Local Plans, such as Lichfield, etc.
3. Non-demolition of historic buildings prior to the 1950s must be made policy or adhered to as part of LCC's commitment to combatting the Climate Crisis through sequestering carbon in its Old Builds.
4. LAs should adopt a Local List of Valued Buildings (Non-designated Heritage Assets), which have been a Government requirement since the policy introduction through the NPPF in 2012. Historic England produced a guide to help Councils in May 2012. Bristol produced an exemplar list in 2015, which is well worth reviewing.
5. Existing Action Plan if present for Designated and Non-designated Heritage Assets needs identifying and/ or establishing (I may support this if invited).
6. Option for people to provide feedback even if out of time for additional documents, such as SPDs or at the discretion of Councils where feedback may be particularly assistive or lead to additional academic and architect guidance. Option for public publishing of feedback should be encouraged with the consultee's consent to encourage wider consultation uptake moving forwards.
7. Era-style Buildings, especially rows of Georgian, Victorian and Edwardian architecture must be faithfully restored, retained and recreated to complement surrounding historic streets that may or may not be classed in official Conservation Areas preventing harsh contrast with newer built housing estates from the 1950s onwards.
8. Where demolition is proposed for 1950s style housing onwards- any new construction must be in the historic building

style and local materials to ensure high carbon capacity, quality aesthetic and true blending of the interconnected conurbations of any one area, place or location.
9. Concerted efforts to identify and locate core suppliers for raw materials and specific heritage skills should encourage new uptake of these limited artisan craft skills by new contractors locally based to support the local economy, provide employment, and reduce the cost of product and service in the long-term.
10. Volunteer labouring assemblies should be fully encouraged and supported identifying key individual an group skillsets that can be utilised to protect historic buildings or areas at risk with a view to supporting the construction of new authentic style housing (as and where appropriate) and the reconstruction of demolished prized old buildings beloved by the community, such as community pubs, libraries and community centres.
11. Simplified streamlined Planning Process for key stakeholders either working to authentically restore buildings and/ or build new ones, such as observed with many civic buildings in Budapest Hungary and the Federal University Buildings in the US.
12. Where there have been evolving building styles over years, eg. Combination of one or more: Georgian, Edwardian and Victorian, the style that best promotes the area, ie. One that has the majority era structures left or capacity size requirements as examples should be utilised by house builders, especially where a streetscape may have been annihilated during the World Wars.
SECTION 2: Designated & Non-Designated Heritage Assets:
1. Enhancement of Historic Areas to remove modern street furniture with the integration of classical style timepieces should be encouraged and pursued wherever possible with clear preferred guides set out for each part of the City.
2. Enhancement of Setting with funding grants and financial incentives from all tiers of Government for Private Investors especially those contributing actively towards achieving Net Zero through Embodied Energy/ Carbon Capacity rich measures, i.e. Retention of Old Builds.
3. Archive Pooling of invaluable source material, such as Historic Photographs, Oil Paintings, such as “Memory Lane” featured on InYourArea Magazine to enrich existing material archives.
4. New officialising of Non-Designated Heritage Assets must be actively supported even if informed by the (wider) community thereby providing some possibility of removing these from risk of demolition.
5. Incentives must be provided to those dependable sincere third party investors that take on, maintain and protect said sites against their annihilation from the streetscape with rescue-packages actively promoted and supported once again with a trusted Directory creating goodwill amongst the local community.
6. Opportunity to meet or correspond on Zoom Conference Call regarding key areas, buildings and places at risk where key stakeholders, such as property owners may be better placed to engage in positive and constructive discussion through third parties, such as myself and a trusted panel of experts in their fields and sectors who could enable these people and organisations to maximise their civic heritage, whilst proactively striving to protect more historic buildings from decline and/ or demolition where a strategy package for raising the revenue to do this could be arranged and facilitated.
7. Defining Character Areas- zoning symmetrical parallel construction recommended where distinctive individualised properties remain as checked against authentic archive blueprints. This will ensure high-quality housing for everyone reducing the societal divides between misperceived “good areas” where affluent people reside in historical style properties and less advantaged reside in contemporary ones.
8. Industry should be conserved at former industrial complexes, such as Economic Docks with equivalent sites offering modern-day uses, alongside traditional uses such as export and import of raw materials at places such as Docks and Port encompassing: ICT sector, Green Research & Development, etc.
9. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of long-beloved buildings, especially those with demonstrable evidence of Holy Worship.
10. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of landmark buildings, especially those with key links to an area’s founding or history locally.
11. All Powers to monitor, collaborate with existing and/ or new property owners to conserve these buildings should become mandatory with appointed Community Champions for Civic Heritage that area direct link between Local Authorities and said wider key stakeholders to prevent demolition of structures that may be at risk of destruction from vandalism, urban exploration and demolition.
12. Reconstruction Programme harnessing existing limited crafts people’s skillsets to be used as a fundraising vehicle to bring back buildings that may have been demolished to dissuade future demolition as a choice by property owners and by means of expanding these otherwise lost skillsets that are at live risk of becoming extinct from the UK.
13. Checklist of buildings at high risk must be expanded beyond the existing groups and organisations that are saturated with high caseloads, such as SAVE Britain’s Heritage, etc so that dialogue channels can be created and fostered between Community Champions for Civic Heritage.
14. Bespoke-tailored funding packages for Properties at Risk of decline or demolition should be integrated with Local, Regional and Central Government-funding as a means of regional economic output through the return on investment that may support other key grant funding capital infrastructure projects, such as transportation and drainage improvements.
SECTION 3: Conservation Areas:-
1. Alterations for Listed Building Consent must be simplified with additional streamlined testing methodologies, such as proof of legitimate third party support, such as correspondence chains between applicant and Groups, such as The Victorian Society that can assist LAs complete workload much sooner allowing more attention for challenging cases, such as Non-Designated Heritage Assets at live or upcoming risk of demolition by Housebuilders, etc.
2. Highways & Street Furniture should be duly supported across the whole of an area to enhance its historic appeal to the commercial community as much to its indigenous community; as this is supported greatly in equivalent Public Realm Strategy SPDs- where any and all guidance and support must and should be provided, with key at risk projects being an exceptional anecdote that may be cited in future documents or versions of this and other consultations to stimulate

economic construction and restoration across other designated Conservation Areas, etc or otherwise.
3. Provide incentives for the return of lost adornments and decorative features, such as roof fixtures like Chimney Stacks once again with an approved contractor directory to make Old Builds practical to own, live and work in the 2020s onwards. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.
4. Permissions for authentic replica and more durable materials, such as reproduction sash windows must be supported to prevent exorbitant high costs through procuring these, limited longevity and economic climates being unstable. This must be assessed on a case by case basis.
5. No more deliberate manipulation and selective misinterpretation of using contemporary modern designs using old-style fabric raw materials, such as stone cladding for new housing where the design and shape clearly undermine the concept of blending within or around a Conservation Area.
6. Compendium of approved and recognised TVA Architects based across the UK with a view to supporting the training in time of more Northern counterparts to reduce cost associated with travel expenses, etc. This will actively reduce the level of demolition applications countering the purpose of this SPD and other live Policy. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.
7. New Conservation Areas should be established covering areas of surviving built historic environment to positively reverse fascia changes to more modern ones.
8. Blue Plaques should be fully supported across as many different Conurbations, especially if Applicants reach out for endorsements.
9. Discretionary Rate Relief should be provided to those proactively support LAs with conserving their respective Conservation Areas through their own resources, skillsets and time as an incentive to others to work alongside the Council positively and constructively.
10. Where long-lost prized buildings are reconstructed whether based in a Conservation Area or not this should confer discretionary financial support, e.g. Rate Relief for the length of time taken to produce this outcome acknowledging the embodied carbon now contributing positively towards the LA's Climate Change Action Plan Targets.
11. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with collaborate fundraising models utilised from key stakeholders, such as property owners, undisclosed third party investors, Residents' Groups, etc.
12. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with authentic identical reproductions permitted where all options to secure finance have been fully exhausted and/or the existing streetscape is at imminent risk of receiving contemporary replacement street furniture on health and safety grounds, eg. Lap Posts.
SECTION 4: Climate Change:-
1. Pleased to note that LAs broadly acknowledge and grasp this concept therefore the aim should be to increase the net number of carbon-rich Old Builds long-term through support packages that will combat the Climate Crisis, provide economic benefit and improve Conservation in a pioneering fashion that may draw wider funding opportunities for the area.
2. Retrofit Ventilation is a key point that should warrant future new construction utilising higher ceilings through the reconstruction of Old Builds outfitted for the modern day with retrofitted energy supplies, etc that will also serve to break down societal dives regarding perceived good and bad areas where streetscapes are harmonious yet distinctly unique in beauty like any one Conservation Area.
3. Embodied energy and embodied carbon- must remain a central priority and so influence new construction to readopt TVA principles as this will be pivotal towards the area's future green credentials as outlined in many existing auxiliary planning documents approved presently with Carbon Studies taken of existing architecture, notably buildings saved from demolition.
4. A brick by brick case study of as many buildings as possible may warrant invitation of national and international academic institutions to undertake a regional or national Carbon Study further justifying the retention of prized Old Builds elsewhere across the area, region and the UK.
5. Sustainable Materials- an approved contractor directory that could readily advise and source the necessary raw materials with realistically reduced costs substantially again deterring potential demolition-driven applicants from consuming workload time of the Planning Department. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of sustainable materials must be provided by the Local Council.
6. Biodiversity- maximise greenery along all arterial roads ad commuter routes with dense tree planting and the introduction of hedgerows and wherever possible financial incentives to get more private property owners on side.
7. Flooding Defences- existing and prospective hotspot areas should be clearly identified for emergency grant funding whereby Local Authorities, especially across a region may agree with the respective Government Department to distribute emergency flooding to prevent costly consequential recurrent repairs.
8. Transportation using arterial roads and commuter routes (Motorways and Railways) should prioritise linking each end of a Local Government sphere with the surrounding Local Government spheres, such as Southport at the very northern tip of Merseyside where transportation links are much weaker with Lancashire in the north and east than with the rest of Merseyside to the south.
9. Coastlines should be reclassified as SSSIs, especially where the economic potential is not being fully realised, such as Coastal Towns with underused Beaches, such as Southport in Sefton as one example for other LAs.
10. Financial Incentives for the demolition of Carbon-poor Glass Towers and contemporary construction should be utilised to restore the skylines across any one area whilst providing better mathematical application of the space for residential and commercial use, such as larger tenement buildings or the original streetscape reinstated yet designated

specifically for housing where there may be a deficit.
SECTION 5: Historic Buildings:-
1. Create a Designated AND a Non-Designated Heritage Asset List, such as AHV whereby existing buildings and those that may yet return can be logged and recorded to combat the Climate Crisis whilst making heritage work for LAs in modern day with attractive locations timeless for everyone to appreciate enhancing the investor appeal, all-round interest and acknowledging the industrial pioneering legacy of the City.
2. Clearance of vegetation along the Railway Lines alongside other equivalent parts of the Line to eradicate the perceived neglected aesthetic.
3. Exception Areas, such as those at risk or recently restored have the real potential for wider grant funding for ambitious projects out of the realm necessarily of undisclosed third party investors supporting Property Owners, therefore all and any support in reaching these person(s) will greatly contribute to all possible tangible success in the interim period.
4. Providing key guidance, such as agreed in-keeping historic street furniture, such as Cast Iron Lamp Posts, Bins, Planters approved upon inspection of historic photographs, agreed installation and where appropriate maintenance by the LA will ensure the iterative success of this transferring to other Conservation Areas, etc.
5. Scheme to rebuild and reconstruct long-lost buildings, prioritising vacant sites that could adapt some mixed use with residential accommodation and commercial application thereby supporting Climate Action, creating employment and recordable success through placing of necessary economic drivers, such as offices for Technology Sector if original use cannot be sourced in sufficient time simultaneously meeting housing targets.
6. Archive Blueprints for historic conurbations that have suffered architecturally over time through building conversions, demolitions, etc should be provided to key stakeholders, if necessary with a printing charge available for official spiral hard copy version to view detailed historic plans covering layouts, etc.
7. Those people and organisations that have either/ both maintained their properties well over the years or may wish to provide additional support to others, such as restorative support, archive blueprint guidance, etc should be eligible for discretionary reductions by the Council across various property taxes where they may be suffering hardship or through personal circumstances.
8. “Newer” style housing with true authentic rhythm, such as Suburban style faux Tudor fascia frontages with red clay tile pitched roofs and terracotta design windows (tile hung walls) are a good compromise whereupon finance and scheduling may otherwise adversely impact on housing settlements.
9. Fascia Frontage details should be reinstated whether in a Conservation Area or not, especially where approval has been granted to rebuild an entire house using breeze block to produce a stereotypical black, white and grey dwelling out of place.
10. LAs should work closely with Foundries to procure raw materials and building services in the event of harnessing their own Contractor Firm(s) in-house that could work cross-authority to make net savings whilst ensuring particular new housing neighbourhoods conform to an appropriate style.
11. Modern “Carbuncle” extensions should not be permitted at any one area- instead an authentic style addition may be used to retain blending.
12. Discretionary financial support packages to assist House Builders choosing the traditional vernacular route should be considered and utilised where it can be proven that this third party will restore the historic streetscape yet making it applicable or modern day requirements- residential or commercial. This may be especially so where they are able to help others prevent the demolition of a prized Old Build built before the 1950s.
SECTION 6: Traditional Vernacular Architecture:-
1. Provide a directory of approved and trusted Conservation Specialist Contractors- this will be key for repairs and maintenance reducing costs for all parties, expediting the physical process of regeneration and smoothen planning work schedules so that finer detail may be considered on priority cases or those that may be at risk of consequential repair, such as Places of Worship and detached Buildings with flat roofs, etc at higher risk of damage than customary dwellings.
2. These same people should be readily contactable for new construction
3. Encourage smart building methods and use of TVA as meticulously explained in this SPD outlining “Breathing” Solid Wall Construction using older style materials thereby reducing maintenance cost which combined with the approved contractor directory will further drive down costs, time and effort for everyone.
4. Alterations- must introduce a simplified listed building consent form and application process that is streamlined encouraging better maintenance of Old Builds and reducing the rising propensity of builders to allow buildings to deteriorate, such as the Historic Pub that had to be rebuilt in Kilburn, London post 2015.
5. Provide specialist Heritage Arts & Craft Skills Programmes that anyone can learn and use so that these high cost tasks can eventually stabilise in price making them more affordable and available to those that don’t have the time to do this themselves or may be risk averse even.
6. Extensions- there must be a proactive emphasis on in-keeping structural fabric to prevent future errors, such as the Municipal Building depicted in the SPD being replicated again thereby harming the Conservation value.
7. New Housing Estates should adopt historical archival blueprints, ie. A Georgian, Victorian or Edwardian layout with the likeliest period architecture utilised where this area remained greenbelt until the 1950s.
8. Area Expansion of housing must revert to traditional timeless designs that confer many practical advantages over modern styles that are harder to maintain are timeless with regard to dating and ensure a more evenly distributed community atmosphere in the long-term future.
9. Infrastructure should be appropriately considered for existing and new areas so that no one area is at risk of becoming congested through traffic for a particular commodity, such as Schools, Doctor Practice, Dental Practice, etc.
10. Site Layouts should complement the historic layout with a view to Post 1950s contemporary Architecture out of place being one day demolished to reinstate Long-lost beloved buildings from before the World Wars that could blossom economically today.

11. Building Form shouldn't permit for dated modern structures that delineate and essentially divide communities between the old and new parts of any one location.
12. Façade Design mustn't be compromised for contemporary architecture, especially in view of coveted Heritage Status for any one area being at risk of being lost if said contemporary architecture is pursued.
SECTION 7: Making an application:-
1. Identify recurring applicants that are harming civic heritage, be this across Conservation Areas, Non-designated heritage assets or elsewhere with experience of demolition to date- this should be considered before granting permission to apply or acquire planning approval.
2. Enforcement Penalties for key stakeholders that purposely allow their properties to fall into decline and hoped eventual demolition through this tactic, which is more prevalent since 2020.
3. Create an Action Plan to deter persons or organisations from pursuing demolition, such as financial incentives, sincere investor network directory set by Central Government to offload for profit and enforced Design Codes that cannot be manipulated through semantics like Design Guides in isolation as has happened elsewhere. This must be kept for emergency instances where there is an expected threat of decline or demolition.
4. Agreed that temporary alteration of heritage sites, such as stairs or ramps for wheelchairs should be utilised to prevent deleterious loss of historic surroundings and features alike.
5. Full Pre-Consultation publicised and utilised to ensure appropriate Design Codes for new housing alongside positioning and layout in case volunteer assemblies may assist property owners with restoration of historic buildings.
6. Brick by brick Analysis undertaken of projects set for Traditional reconstruction so that these statistics may provide both the Council with evidence for green grant funding support for other key infrastructure projects, such as Transportation and
Drainage Defences and property owners may incur a discretionary reduction in associated reconstruction costs of heritage buildings and vistas.
7. Ability to lock feedback in for Consultation automatically unless the council can alert interested consultees in taking part again whether they are locally, regionally or nationally based.
8. Special partnerships with Property Owners of historic buildings at risk of decline/ demolition to discreetly support them with the option to publicise this accordingly to reach out to others in the same position to secure alternative use for these structures as opposed to demolition.
9. Proactive effort to stop Breaking and Entering style of "Urban Explorers" who are coincidentally apparent whenever demolition is scheduled for buildings especially since 2020.
10. LAs to proactively work closely alongside Community Champions and other leading Heritage Groups, such as English Heritage giving these organisations a voice on the frontlines, especially where so many buildings are presently being overlooked for additional guidance and/ or support due to cost and time restraints facing these same groups and organisations (including the LA).
SECTION 8: MISCELLAENOUS:-
1. Provide all possible support for the reconstruction of Old Builds as is happening elsewhere across Europe, especially Budapest, Hungary, North America, etc to significantly increase Embodied Energy/ Carbon storage.
2. Establish a Plan to adopt Unadopted Roads or supply key services, such as carriageway resurfacing as disabled access and entry/ exit of Emergency Vehicles is presently a cause for concern.
3. Provide Pre-Approval and agreement of specialist Conservation Area style Historic Street Furniture, such as Cast Iron Lamp Posts, Bins and Planters for this prime Conservation Area including installation, maintenance costs (where appropriate).
4. Provide full access to the Archive Resources (at no/minimal cost) as an invaluable incentive for existing and parallel undisclosed third Party Investors. Discretionary waivers may be appropriate for those third parties proactively working to prevent decline and demolition of historic buildings.
5. Car Parking on and off street should be supported to ensure freedom of choice for everyone, accessibility and connectedness.
6. Car Parking abodes should be tastefully designed like modern-day stables for vehicles that are in-keeping with the built historic environment.
7. Provide publicly published names of consultees willing to work alongside the Local authority and other key stakeholders, such as property owners and undisclosed third party investors, etc.
8. Provide select tours for prospective investors and housebuilders of existing traditional architecture where Design Codes of this identical style would complement both old and new architecture bending the area better more cohesively, eg. the form and layout of Oxford City Centre which has changed minimally structurally since the 1800s.
9. Provide a focused effort on utilising people's skillsets on a meritocratic basis, ie. Procure specialists and volunteers that could work together on key emergency projects, such as Historic buildings at risk without layered bureaucracy on achieving positive outcomes, such as Community Assets where deadlines can be thwarted by separate third parties.
10. Create a Top Ten Historic Buildings at Risk Register where appropriate conditions, such as security against Urban Exploration, etc can be utilised safeguarding these structures, providing the respective property owners peace of mind whilst actual scope for revitalising these for solid economic gain.
11. Infrastructure assessments should be fully outlined, such as Air Quality risk from new construction at presently congested areas, hence the case for Traditional Architecture that will confer longevity benefits in the long-term with as much free car parking as possible.
12. Free Car Parking may be monitored through expected proof of purchase when visiting, eg. minimal £1.00 at a shop encouraging partnerships between private businesses and LAs.

Change suggested by respondent:

-

Sound: Not specified

Attachments:
Email representation - https://valeofglamorgan.oc2.uk/a/33d

6927 Object

Document Element: CC2 - Presumption Against Demolition
Respondent: Barratt Redrow Homes [2669]
Agent: Boyer Planning

Summary:

Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including
farm buildings.

Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.

An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.

Full text:

1. INTRODUCTION
1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.
1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:
• Section 3 – The Vale of Glamorgan Key Characteristics;
• Section 4 – RLDP Key Themes, Vision, and Objectives;
• Section 5 – Sustainable Growth Strategy; and
• Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.
1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS
Settlement Pattern
2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.
2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Need
2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.

2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.

3. RLDP KEY THEMES, VISION, AND OBJECTIVES

3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.

Key Themes

3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.

3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.

3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.

Vision

3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.

3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.

3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.

Strategic Objectives

Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.

Objective 4 – Placemaking

3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.

3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.

Objective 8 – Promoting Active and Sustainable Travel Choices

3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.

3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.

3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY

Growth Strategy

4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:

1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords

with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.

4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
5.10 For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing

target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

5.11 More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

5.12 Whilst Barratt Redrow appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range, having reviewed the Deposit Plan evidence base Barratt Redrow believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.

5.13 In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

5.14 Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).

5.15 In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

5.16 In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need. Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036) and therefore is made up of

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.

5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes

which comes forward on windfall sites varies significantly year on year.
5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.
5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.
5.27 In summary, Barratt Redrow acknowledge the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
5.28 These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance and additional site allocations, such as Swn Y Coed, Wenvoe, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
5.29 Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.
5.30 Accordingly, despite Wenvoe being identified as a primary settlement, Policy SP2 notes that development in this location will be limited to 'the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.' Similarly, it is noted that Policy SP2 does not consider Wenvoe to be an appropriate location for ''substantial additional growth''.
5.31 Barratt Redrow object to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified.
5.32 First of all, the Deposit Plan acknowledges that it performs a similar function to the Primary Settlements located within the Strategic Growth Area and it is described as one of the 'sustainable communities' in The Vale of Glamorgan Key Characteristics section, as noted previously in Section 3.
5.33 Likewise, the site benefits from excellent accessibility the local public transport network, active travel routes and local services. These characteristics fully accord with Welsh Government's strategic objectives and emphasise the fact that Swn Y Coed constitutes an appropriate location for future housing.
5.34 With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge''. Barratt Redrow do not consider this to be sufficient justification to discount the site from allocation as there would be limited impact on BMW agricultural land arising from the development of Swn Y Coed.

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available.
5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.
Policy SP4 - Placemaking
5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.
5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the

Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.
5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.
5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.
5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
Policy PGD1 – Creating Well Designed and Inclusive Places
5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these

amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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Unsustainable Location & Poor Connectivity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.

• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.
• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.
• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.
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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
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• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply
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• HG1 (8) St Athan - Clive Road, St Athan

Policy HG3 – Housing Led Redevelopment Opportunity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100

meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).
• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4).Finally, the Council's own Viability Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.
• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of

Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.
• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:
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Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:
i. Space heating demand less than or equal to 40kWh/m2/year;
ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.
• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
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Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as

part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established 'defensible' limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be 'largely shielded from view by woodland blocks/strips'.
• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for 'infilling' the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.
• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
•

Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
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• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
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Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.
• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
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MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
•
• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine

the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
•
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• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
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CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the Council's vision for the VoG.
• 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
• 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
•

6. CONCLUSION
• Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.
• Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swn Y Coed, are necessary to ensure the RLDP is able to effectively meet
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Barratt Redrow welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Barratt Redrow support the requirements for affordable housing in new development. In its current form the

proposed policies SP7 and SP8 lack sufficient flexibility for site specific circumstances and physical constraints which may impact upon delivery. This inevitably creates uncertainty for a number of sites, where the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities.
• From a planning perspective it is also important to recognise the additional benefits the site (Candidate Site Ref No. 437) could provide in accommodating the increased housing need generated by the suggested 15% flexibility allowance within a highly sustainable location. The principles of which clearly align with the Council's aspirations and would maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport

Change suggested by respondent:

Re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes,

An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3ch

7085 Support

Document Element: CC2 - Presumption Against Demolition
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and repurposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.

Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need

and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.

In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.

Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.

Policy SP6 – Housing Requirement Position: Object

Barratt Redrow objects to Policy SP6.

Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.

PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:

"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."

The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:

"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.

5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.

5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."

Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:

• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;

• Does not actively seek to address the area's ageing demographic;

• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;

• Does not seek to leverage any of the investment into the region through the CCR City Deal;

• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and

• During the period considered, many people were prevented from forming new households due to a lack of mortgage

finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to “boom” or “recession” factors impacting on affordability are nevertheless able to “catch-up” later on – 80% of the gap at the age of 30 is “caught-up” by the age of 40. This finding supports the resumption of long-term household formation trends.

In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.

That concern is reinforced by the updated Welsh Government evidence published after the RLDP’s preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.

The updated 2022-based household projections point in the same direction. Welsh Government’s latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or “business as usual” response for the Vale. It points the other way.

This sits uncomfortably with the Council’s own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.

The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.

There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.

A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.

The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.

The Council’s own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a

1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader

and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.

Policy SP6 – Flexibility, housing land supply and trajectory Position: Object

Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.

The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.

In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.

The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.

The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.

Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.

The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.

There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.

In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.

Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part

Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.

The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on

the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being “informed” by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.

That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.

There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.

The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.

In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.

Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part

Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.

The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.

In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be “informed” by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council’s latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan’s blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.

8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part

Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However,

there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.
The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;
• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.
The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply.

In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.

Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object

Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.

There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.

A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.

Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.

In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.

Policy CI1 – Open Space Provision

Position: Support in principle / Object in part

Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.

The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.

There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.

Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be

addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.

Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486
Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.
Stage 2 Candidate Site Assessment
The Council's Stage 2 Candidate Site Assessment states:
"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."
The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:
Impact upon Character and Setting of the St Nicholas Conservation Area
Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.
The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:
• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.
Countryside Impacts
The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.
The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.
Agricultural Land Quality
Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available

survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.
As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.
Appendix 2 – Summary of Assessment
We comment on the Council's Summary of Assessment as follows:
• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7086 Object

Document Element: CC2 - Presumption Against Demolition
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The overall wording leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.

Full text:

Introduction
These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.
Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.
Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.
That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.
The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.
The remainder of these representations address the specific policies of the Deposit Plan.
Deposit Plan Plan Period Position: Object
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.
Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part
Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.
Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.
This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable

transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.
St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.
Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:
"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)
Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:
St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper (June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited

rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.

Policy SP6 – Housing Requirement Position: Object

Barratt Redrow objects to Policy SP6.

Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.

PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:

"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."

The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:

"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.

5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.

5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."

Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:

• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;

• Does not actively seek to address the area's ageing demographic;

• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;

• Does not seek to leverage any of the investment into the region through the CCR City Deal;

• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and

• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.

In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.

That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are

national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on

affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.
Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.
The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.
There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.
In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.
Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part
Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.
The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.
That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA

also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.
There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix.
The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.
In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.
Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.
The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be “informed” by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council’s latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan’s blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.
8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part
Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.
The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan’s supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;
• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan’s effective provision.
The Deposit Plan’s own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted

strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed,

the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.

A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1 alongside the wider requirements of the RLDP.

Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.

In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.

Policy CI1 – Open Space Provision

Position: Support in principle / Object in part

Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.

The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.

There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.

Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.

Policy SP4 – Placemaking

Position: Support in principle / Comment

Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.

That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.

Suggested wording amendment:

"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking

principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;

• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.

The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.

For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.

Candidate Site Register - Site ID 486

Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.

Stage 2 Candidate Site Assessment

The Council's Stage 2 Candidate Site Assessment states:

"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."

The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:

Impact upon Character and Setting of the St Nicholas Conservation Area

Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.

The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:

• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;
• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;
• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and
• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.

Countryside Impacts

The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.

The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.

Agricultural Land Quality

Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.

As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.

Appendix 2 – Summary of Assessment

We comment on the Council's Summary of Assessment as follows:

• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.
• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.
• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The

Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.
• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.
• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.
• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.
• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7087 Comment

Document Element: CC2 - Presumption Against Demolition
Respondent: Barratt Redrow Homes [2669]
Agent: Highlight Planning

Summary:

Amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.

Full text:

Introduction

These representations are provided on behalf of Barratt Redrow in respect of the Vale of Glamorgan Council's consultation on the Replacement Local Development Plan (RLDP) Deposit Plan and Candidate Site Register. They should be read in conjunction with the enclosed completed Comments Forms.

Barratt Redrow are promoting land at St Nicholas (Site ID 486) for a residential-led development of up to 140 modern, energy efficient homes, 40% of which are currently proposed to be affordable.

Barratt Redrow is generally supportive of the Council's work in preparing the RLDP. The preparation of an up-to-date development plan for the Vale is plainly important and the Council is to be supported in progressing the RLDP through to Deposit stage. The principle of a plan-led strategy, rooted in settlement evidence, affordable housing need and sustainable transport objectives, is endorsed. That is particularly important in the current plan-led Welsh planning context.

That said, in its current form the Deposit RLDP is not sufficiently ambitious and, in our view, requires a number of important changes in order to ensure soundness. The key concerns relate to the overall housing requirement, the level of flexibility built into the strategy, the degree of reliance placed on key sites, windfalls and rolled forward supply, the unduly restrictive approach taken to sustainable settlements outside of the Strategic Growth Area and the introduction of onerous policies that when considered together could impact deliverability. Those issues are especially relevant to St Nicholas, which the Council's own evidence identifies as one of the better performing Minor Rural Settlements and one which has an established role in supporting a sustainable rural community.

The Council's own evidence base supports a stronger role for St Nicholas than the Deposit Plan currently allows. It demonstrates that proportionate growth in settlements such as St Nicholas is not a departure from the Council's established strategy; it is consistent with it. The Deposit RLDP should be amended so that it better reflects both national policy and the Council's own evidence, and in particular so that sustainable and deliverable opportunities such as St Nicholas are able to make an appropriate contribution to meeting the Vale's housing needs.

The remainder of these representations address the specific policies of the Deposit Plan.

Deposit Plan Plan Period Position: Object

Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.

On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.

Based on the current timetable, an end date of 2038 (with associated increase in housing requirement) would therefore ensure a sound plan.

Policy SP1 – Sustainable Growth Strategy Position: Comment / Object in part

Barratt Redrow supports the broad objective of pursuing a sustainable growth strategy and agrees that growth should be directed towards the most sustainable locations. The emphasis on public transport connectivity, access to services and the need to align housing growth with wider regional aspirations is supported in principle. The Deposit Plan's summary of Future Wales correctly notes that the Vale lies within the Cardiff, Newport and the Valleys National Growth Area and that Local Development Plans should recognise this area as the focus for strategic economic and housing growth, services and facilities, and transport infrastructure. The Plan also correctly highlights Future Wales' wider outcomes, including vibrant rural places with access to homes, jobs and services.

Our concern is that the strategy as drafted is not sufficiently nuanced and, in practice, it places too much weight on the Strategic Growth Areas and not enough weight on sustainable settlements outside it. In doing so, it risks overlooking villages which perform well against the Council's own settlement evidence and which can accommodate proportionate growth in a highly sustainable way. St Nicholas is a clear example of that. The earlier Barratt David Wilson Homes representations made this point and it remains equally relevant now: the strategy should not be read as favouring rail-served locations to the exclusion of settlements with strong bus accessibility and established local services.

This is important because the Council's own evidence does not justify such a narrow interpretation of sustainable transport. The BP5 methodology was adapted specifically to better appreciate the role and function of settlements in the Vale, including their relationship to key services and facilities. In other words, the Council has already recognised in its evidence base that sustainability in the Vale cannot sensibly be reduced to rail access alone.

St Nicholas benefits from strong bus connectivity and a strategic relationship to Cardiff and other settlements. Supporting population growth in proximity to regular bus services can itself help reinforce the viability of those routes.

Para 3.45 of PPW states the following in respect of relationships beyond the Council's administrative area:

"The evidence to identify suitable areas and sites for development should not be confined by local authority boundaries. It should reflect realities like housing markets, travel to work areas, retail catchments and the nature of activity or development itself." (emphasis added)

Cardiff is by far the greatest attractor in terms of commuting destination, as shown in the below Census data for the Vale of Glamorgan:

St Nicholas is 16 minutes from Cardiff via bus. Not all people will want to live in towns (as recognised by the Council in their response to the draft NDF). The Spatial Option is depicted on Page 28 of the Spatial Options Background Paper

(June 2023). This fails to show St Nicholas as a settlement with frequent bus connectivity despite it being served by excellent bus service provision.
Future Wales supports development which aligns with the South East Wales Metro which includes bus infrastructure and services as well as the rail network. The Deposit Plan's focus on settlements with railway stations ignores settlements with bus service provision such as St Nicholas where travel via bus is an attractive, sustainable and convenient option for residents. For example, the travel time on bus to Cardiff from St Nicholas is 15 minutes, whereas the travel time from Rhoose to Cardiff via train is over double the time at 36 minutes.
Settlements such as St Nicholas will require additional growth over the coming years in order to contribute to their vibrancy and support existing services and facilities such as the local school and bus service. That remains a legitimate and important planning point. Future Wales, as summarised in the Deposit Plan, requires local authorities to maximise opportunities arising from public transport investment and to plan for growth that supports sustainable connectivity more generally, not simply around rail stations.
There is therefore a soundness issue here. The Council's own evidence and national policy context support a strategy that captures sustainable bus-connected settlements as well as rail-served settlements. St Nicholas should be expressly recognised as one of those locations. If the Council is seeking to direct development to places "best served by public transport connectivity and [which] offer a good range of services and facilities", then it should ensure that this is applied consistently to settlements such as St Nicholas rather than in a way that, in practice, privileges only a narrow subset of locations.
For that reason, Policy SP1 should be amended to make clearer that sustainable settlements outside the Strategic Growth Area, where there is good bus connectivity, local facilities and a clear functional relationship with wider employment and service centres, are capable of accommodating proportionate growth. That change would make the strategy more aligned with the evidence base and would support a more robust and resilient pattern of housing delivery.
Policy SP2 – Settlement Hierarchy Position: Object
Barratt Redrow objects to Policy SP2 in its current form.
The Council's own evidence shows that St Nicholas performs strongly as a Minor Rural Settlement. It scored 39 points and ranked 5th out of 21 Minor Rural Settlements within the Settlement Appraisal Background Paper. It is one of the few settlements in this tier with a school in the village and that its strategic position and public transport accessibility lend support to it being treated as a sustainable settlement capable of accommodating further growth.
That broader conclusion is reinforced by the Deposit Plan itself. Paragraph 6.16 expressly identifies St Nicholas as one of the smaller rural settlements which contains a primary school serving a wider catchment area. The Plan goes on to recognise that, due to the functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported or enhanced where appropriate. Those are helpful and important acknowledgements.
However, notwithstanding that evidence, the policy framework remains highly restrictive. The Deposit Plan states that, in Minor Rural Settlements, general market housing will be limited to infill and conversion opportunities within the settlement boundary, whilst any more meaningful growth outside the Strategic Growth Area is essentially restricted to small scale affordable housing-led schemes with a minimum 50% affordable housing requirement. In our view that is too blunt an approach and is not justified by the evidence.
The reason this matters is because the Council's own historic and current evidence points in the opposite direction. BP5 explains that the adopted LDP provided for moderate growth in Minor Rural Settlements to help meet local housing need and support existing local services. The adopted LDP Written Statement similarly states that minor rural settlements such as St Nicholas play an important role in underpinning sustainable rural communities and that there is a need for some moderate growth in these settlements. The earlier strategy therefore recognised that such locations could accommodate growth without undermining their character or function. The successful development of by Redrow of Cae Newydd, St Nicholas provides an example of how new residential development can successfully integrate into a Minor Rural Settlement.
In our view the current Deposit strategy has moved too far away from that balanced position. The Plan now acknowledges the sustainability credentials of St Nicholas but does not allow those credentials to translate into an appropriate development role. That disconnect between the evidence and the policy response is one of the main reasons why the Plan, as drafted, is not sound.
Accordingly, Policy SP2 should be amended. At the very least, it should be recast so that settlements such as St Nicholas are not treated as locations where only very limited growth can occur. A more proportionate and evidence-led approach would be to allow moderate mixed-tenure growth in the more sustainable Minor Rural Settlements, where this is supported by site-specific evidence and good placemaking. That would better reflect both the Council's own settlement appraisal and the adopted LDP approach that preceded it. As drafted, the Plan expects a great deal from a very limited rural supply offer. It seeks to secure a minimum 50% affordable housing provision on qualifying sites, requires the mix of homes to respond to latest evidence, including specialist and older persons' needs, and recognises the need for both affordable and market housing to support mixed communities in rural areas. The Plan also acknowledges the functional role of Minor Rural Settlements such as St Nicholas and the importance of supporting local services within them. In our view, those objectives are unlikely to be achieved through the very limited number of affordable housing-led allocations currently proposed. Additional sites in the more sustainable Minor Rural Settlements are therefore required if the Plan is to deliver what it seeks in a realistic, deliverable and sustainable manner.
Policy SP6 – Housing Requirement Position: Object
Barratt Redrow objects to Policy SP6.
Whilst we support the Council's intention to plan positively for housing growth through an up-to-date RLDP, the proposed housing requirement of 7,890 dwellings is not considered sufficiently ambitious and, in our view, is no longer justified by the most up-to-date evidence. The Deposit Plan identifies a requirement of 7,890 dwellings, equating to 526 dwellings per annum, with provision for 8,660 homes once the 10% flexibility allowance is applied. That requirement remains

rooted in the RLDP's dwelling-led scenario, which the LHMA explains was derived from average completions over a 10-year period. In our view, that is too conservative an approach in present circumstances.
PPW and the Development Plans Manual is clear on this point. PPW sets out the following requirements for local authorities when setting a housing requirement at paragraph 4.2.6:
"The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans. These should be considered together with other key evidence in relation to issues such as what the plan is seeking to achieve, links between homes and jobs, the need for affordable housing, Welsh language considerations and the deliverability of the plan, in order to identify an appropriate strategy for the delivery of housing in the plan area. Appropriate consideration must also begiven to the wider social, economic, environmental and cultural factors in a plan area in order to ensure the creation of sustainable places and cohesive communities."
The Deposit Plan housing requirement is based on past delivery rates and does not take account of the above policy requirements. Whilst past build rates can be used as a benchmark for comparison, it is not appropriate for this to be used to set the future growth of the Authority Area. The Development Plans Manual states the following in this respect:
"5.55 Extrapolating forward past take-up rates for both jobs and homes over various time periods gives a factual representation of what has been delivered in the past. This approach can provide a useful benchmark against which to compare future employment and household growth, assuming previous conditions remained constant. However, this may have been constrained by contextual influences applicable at a previous point in time, for example global economic markets, or have led to undesirable outcomes which should not be repeated, such as a mismatch between the number of homes and jobs.
5.56 It will be important to understand the relationship between the past and the future direction of the plan, including such contextual circumstances. If there are/were limitations that hindered the ability to deliver growth previously, then until mechanisms are in place to address such matters this could have a bearing on future growth levels. Understanding the context within which delivery was/can be achieved will be important, particularly when considering a housing trajectory as this could influence the speed and increase delivery rates, or conversely result in a delivery cap until such matters are resolved.
5.57 Just relying on past build rates as the sole evidence base to quantify future employment and housing land requirements is not sufficient on its own. Additional evidence will be required to identify the scale of new jobs and homes necessary and the related land requirement."
Contextual factors that mean utilising past build rates in setting future housing growth is inappropriate include:
• Utilising past build rates incorporates recession-based trends. This includes supressed build rates following the 2008 recession and more recently, reduced housing completions as a result of the Covid-19 pandemic and the current cost of living crisis;
• Does not actively seek to address the area's ageing demographic;
• Does not reflect or take account of the Vale of Glamorgan's position within a Growth Area within Future Wales;
• Does not seek to leverage any of the investment into the region through the CCR City Deal;
• Conflicts with the Deposit Plan's ambition in terms of Homes For All and the Economy – in that there has been no recent job growth in the Vale of Glamorgan delivered under the current LDP and there is a shortage of housing and affordable housing. Applying the same build rate over the RLDP plan period would compound these issues; and
• During the period considered, many people were prevented from forming new households due to a lack of mortgage finance, lower employment levels and reduced rates of housing completions. There is a considerable body of evidence to show that household formation will return to long term trends if housing is made available. Research by the former National Housing and Planning Advice Unit (NHPAU)4 found that cohorts who are less able to access home ownership earlier in their housing career due to "boom" or "recession" factors impacting on affordability are nevertheless able to "catch-up" later on – 80% of the gap at the age of 30 is "caught-up" by the age of 40. This finding supports the resumption of long-term household formation trends.
In short, just relying on past build rates as the sole evidence base to quantify future housing land requirements is not sufficient on its own, and that additional evidence is required to identify the scale of new homes necessary, with alternative scenarios considered rather than simply extrapolating previous delivery trends. That is directly relevant here. A housing requirement derived too closely from historic completion rates risks baking in past under-delivery rather than planning positively for future need.
That concern is reinforced by the updated Welsh Government evidence published after the RLDP's preferred growth scenario was formulated. The latest 2025-based estimates of additional housing need identify newly arising need in Wales of between 7,800 and 9,300 additional homes per annum over the first five years, with a central estimate of around 8,700 homes per annum, alongside a separate estimate of existing unmet need of 9,400 homes. Whilst those are national figures and do not automatically translate into a single local housing target, they plainly point towards a materially higher level of need than has previously been assumed and strengthen the case for local planning authorities, particularly in growth areas, to revisit conservative housing requirements.
The updated 2022-based household projections point in the same direction. Welsh Government's latest figures show that the number of households in Wales is projected to increase by 7.2% between mid-2022 and mid-2032, and that the Vale of Glamorgan is projected to experience one of the largest percentage increases in Wales, at 11.7%. The same release notes that the Vale is also amongst the authorities expected to experience some of the strongest private household population growth. In short, the latest demographic evidence does not support a low-growth or "business as usual" response for the Vale. It points the other way.
This sits uncomfortably with the Council's own housing evidence. The Deposit Plan records that the Vale has the highest affordability ratio in Wales and a significant need for affordable homes. It further records that the LHMA identifies affordable housing need averaging 461 dwellings per annum over 15 years using the principal projections, rising to 502 dwellings per annum under the RLDP projection figures. The Deposit Plan also acknowledges that only a proportion of

new households will require affordable housing because others will meet their needs through the market. That is important, because it underlines the need for both affordable and open market housing, and therefore for a higher overall housing requirement than the Plan currently proposes.
The Deposit Plan principally seeks to address issues of affordability through a blanket 50% affordable housing requirement on sites other than the Key Sites. Whilst we fully support the Council in looking to address issues of affordability, we consider that an increase in the housing requirement and subsequent increase in housing supply (both open market and affordable) should be pursued.
There is a broader strategic point as well. The Vale sits within the wider Cardiff housing market and the Deposit Plan itself recognises the strong migration relationship with Cardiff and the role that strategic collaboration should play in considering housing growth. Against that background, and having regard to the updated Welsh Government evidence, the present requirement of 7,890 dwellings does not appear sufficiently ambitious for a National Growth Area authority with strong migration inflows, severe affordability pressures and one of the highest projected household growth rates in Wales. In our view, the Plan should test a higher housing requirement through examination.
A higher growth rate, such as the PG-5Y scenario or higher should be adopted to better align housing and job growth and redress socio economic trends. The likelihood of this of level of growth occurring is even greater in the context of the ambition and funding available to support the City Deal. However, in seeking to deliver the economic vision for the area, it is important to ensure that economic growth is not constrained by a lack of land (for either housing or employment). Whilst this is higher than past build rates, it should be noted that build rates are closely related to the availability of deliverable sites; therefore, the allocation of sufficient housing land in the RLDP would go a long way to increasing delivery. Current delivery rates have been supressed by wider socio economic trends and reliance within the existing LDP on large strategic sites (i.e. Barry Waterfront). Basing the RLDP Growth Option on past delivery would therefore result in an increase in the number of suppressed households. There is no rationale or justification to set future housing need by reference solely to past delivery rates.
The key point for soundness is therefore a simple one. The Development Plans Manual requires a housing requirement to be grounded in a broad evidence base and not simply in past completion trends. The latest demographic and housing need evidence now available points towards stronger growth pressure than that reflected in Policy SP6. In those circumstances, retaining the current requirement without revisiting it would not, in our view, be consistent with the Development Plans Manual or with a genuinely evidence-led plan-making exercise.
The Council's own evidence supports the use of a 4% household-to-dwelling conversion factor. The LHMA states that the RLDP preferred growth scenario assumes growth of 7,586 households, which equates to 7,890 dwellings once vacancy rates are applied, effectively applying a 4% uplift in practice. That approach is also consistent with the adopted Vale of Glamorgan LDP, which expressly applied a
1.04 household-to-dwelling conversion ratio in deriving part of its housing requirement. In those circumstances, and absent any robust local evidence justifying a different factor, it is entirely appropriate to apply the Development Plans Manual baseline uplift of 4% to any updated household-led requirement. On that basis, a requirement of 9,623 households would convert to 10,008 dwellings, which is around 26.8% above the 7,890 dwellings currently sought under Policy SP6 and further underlines that the Deposit RLDP is not sufficiently ambitious in housing terms.Accordingly, Policy SP6 should be amended to provide for a higher housing requirement. The precise figure is ultimately a matter for examination, but the current requirement is too low, too closely tied to past build rates, and insufficiently responsive to updated Welsh Government projections and housing need evidence. A higher requirement would also require a broader and more resilient supply portfolio, which in turn strengthens the case for additional deliverable sites in sustainable settlements such as St Nicholas.
Policy SP6 – Flexibility, housing land supply and trajectory Position: Object
Barratt Redrow also objects to the level of flexibility embedded within Policy SP6 and raises concern regarding the resilience of the housing land supply and the robustness of the housing trajectory.
The Development Plans Manual is clear that housing supply is the housing requirement plus a flexibility allowance. It further states that it will be extremely rare for all sites identified in a plan to come forward within the timescales anticipated, and that a development plan will not be effective if it cannot accommodate changing circumstances. For that reason, a flexibility allowance must be embedded into the plan. Whilst the Manual says that 10% may be a starting point, it also makes clear that the level of flexibility is for each authority to determine based on local issues and that any chosen level must be robustly evidenced.
In our view, a 10% flexibility allowance is not sufficient in the context of this Plan. The Deposit Plan's housing provision of 8,660 dwellings is made up of 3,837 dwellings from the existing land supply, 3,520 dwellings on allocated sites and 1,303 dwellings from windfalls. The Council's housing land supply paper then shows that the allocation component itself includes 959 dwellings on rolled-forward LDP sites, 2,278 dwellings on key housing allocations, 122 dwellings on affordable housing-led sites and 161 dwellings on other allocations. That is a relatively exposed and finely balanced supply portfolio.
The resilience issue is due to a substantial element of the supply depends on a relatively small number of key sites, a significant rolled-forward component, and a large windfall assumption. The Development Plans Manual states that rolled-forward allocations require careful justification, that there must be a substantial change in circumstances to demonstrate such sites can be delivered and justify being included again, and that clear evidence will be required that those sites can be delivered. That is a demanding test, as it should be. In our view, the Plan's reliance on rolled-forward sites and key sites means that a modest flexibility allowance of 10% does not provide a sufficient margin of safety.
The housing trajectory also warrants closer scrutiny. The Development Plans Manual describes the housing trajectory as the key mechanism for demonstrating how all sites will be delivered in the identified timescales throughout the whole plan period. It states that lead-in times for larger sites, inter-relationships between sites, constraints, infrastructure timing and assumptions for both large and small windfalls must all be taken into account. It also requires trajectories to provide a steady flow of sites through the plan period and not to be unduly loaded towards the end of the period.

Against that benchmark, there is a legitimate question over whether the RLDP trajectory is sufficiently robust. The Council's own housing land supply paper records stakeholder concerns that the trajectory shows a significant step change in delivery above previous rates, that there is too great a reliance on key sites, and that the assumed timescales for pre-application work, application determination and discharge of conditions are too short. The consultation summary specifically records concern that delivery rises from around 400 to 500 dwellings per annum in the early monitored years to around 1,000 dwellings per annum by 2027/28, and that this represents a marked and pronounced step change. Those are not peripheral issues; they go directly to the credibility and resilience of the trajectory.

The same background paper also confirms that over 25% of the Plan's total provision is attributed to key sites. Again, that does not make the Plan unsound in itself, but it does mean the trajectory and flexibility allowance need to be particularly robust. In our view, the current Plan does not yet demonstrate that level of resilience. The delivery assumptions may prove achievable, but the point for examination is that they require close scrutiny and should not simply be accepted at face value, particularly when the Development Plans Manual emphasises realism, flexibility and steady delivery through the full plan period.

There is also a concern about the windfall component. The Council's evidence assumes delivery of 1,303 dwellings from large and small windfall developments over the lifetime of the plan. The Development Plans Manual accepts that windfalls can form part of supply, but it also requires the assumptions behind them to be evidenced and scrutinised. Here, the windfall figure is material, not marginal. That is another reason why the resilience of the identified allocation portfolio matters so much. Where a plan is relying on rolled-forward sites, key sites and substantial windfalls all at once, there is a stronger case for a higher flexibility allowance and for a broader pool of deliverable sites.

In our view, the sounder approach would be to increase the flexibility allowance from 10% to 15% and broaden the supply base through the inclusion of additional sustainable and deliverable sites. That would better reflect the Development Plans Manual's requirement for plans to remain effective in the face of delay and changing circumstances, and it would reduce the risk of the RLDP becoming over-dependent on a narrow set of sites and optimistic delivery assumptions. It would also be entirely consistent with wider Welsh plan-making practice, where flexibility allowances above 10% have been accepted where local circumstances justify it. By way of example, Flintshire's adopted LDP applies a flexibility allowance of over 13%, while Bridgend's recently adopted RLDP provides for a 14% flexibility allowance following examination. Against that background, and having regard to the Vale RLDP's reliance on key sites, rolled-forward allocations, a substantial windfall component and a stepped housing trajectory, a 15% allowance is justified here as a proportionate and robust response to the particular delivery risks of this Plan.This point also links directly back to St Nicholas. If the Plan is to be made sound, it should not rely so heavily on a small number of large, longer-lead sites and on a substantial windfall allowance. It should include a broader range of deliverable sites capable of contributing earlier and more reliably to the housing trajectory. A sustainable, mixed-tenure site at St Nicholas would assist in precisely that respect by diversifying the supply portfolio and improving resilience.

Policy SP7 – Affordable Housing Provision Position: Support in principle / Object in part

Barratt Redrow supports the objective of delivering affordable housing and agrees that this is one of the key issues the RLDP must address. Policy SP7 is therefore supported in principle. However, the policy should be read in conjunction with a more ambitious overall housing strategy, because affordable housing delivery cannot sensibly be divorced from the wider question of total supply.

The Deposit Plan is clear that the delivery of affordable housing is a key objective of the RLDP and that the strength of the Vale's housing market has resulted in many local people experiencing difficulties in purchasing suitable housing on the open market. Barratt Redrow supports that objective in principle. The policy also correctly identifies that a mix of affordable housing will be required, with reference to the LHMA, and that this should include a range of tenures, types and sizes of homes. That said, the wording of Policy SP7 lacks sufficient clarity. In particular, the reference to the affordable housing mix being "informed" by the LHMA is ambiguous. It is unclear whether the LHMA is intended to provide a broad evidence base and starting point for negotiation, or whether the Council expects schemes to replicate that mix as a fixed requirement. In our view, the policy should be clarified so that the LHMA is expressly treated as a guiding framework rather than a prescriptive formula, with the final tenure mix, type and size of affordable provision being determined having regard to site-specific circumstances, up-to-date evidence, viability and deliverability.The LHMA is highly relevant here. It explains that affordable need is no longer confined to traditional social rented housing and that current economic conditions have squeezed many households out of both home ownership and the private rented sector, creating additional need for intermediate rent and low-cost home ownership products. It also notes that an ongoing supply of new build properties remains important to the operation of assisted home ownership products in the Vale.

That evidence is important because it confirms there is a need for both affordable and open market housing. The market sector is not separate from the affordable housing challenge; it is part of how that challenge is addressed. The LHMA also makes clear that only a proportion of new households will require affordable housing because others will meet their needs through the market. This is another reason why the overall housing requirement matters so much.

There is also a more local point relevant to St Nicholas. The LHMA identifies St Nicholas & Llancarfan as a distinct housing market area and shows need arising there across tenures. It is therefore not correct to approach St Nicholas on the basis that only one tenure or one product type is needed. The evidence points to a requirement for a broader mix. The Deposit Plan itself supports that conclusion. It acknowledges that, in meeting Policy SP7, a range of affordable tenures, types and sizes of homes will be required. It also records that the Council will seek to secure an appropriate level and mix of affordable housing in all proposed residential developments.

In our view, the main issue with Policy SP7 is therefore not its objective, but the fact that the rest of the strategy is not sufficiently ambitious to support it. The Plan cannot identify very substantial affordable need and then pursue a relatively low overall housing requirement combined with a narrow rural growth model. A sound approach would be to increase the overall housing provision and broaden the pool of sustainable and deliverable mixed-tenure sites so that affordable housing delivery through the planning system can be maximised. St Nicholas should form part of that response.

Policy SP8 – Affordable Housing Requirements Position: Support in principle / Object in part
Barratt Redrow supports the principle that residential development should contribute towards affordable housing need. However, there are concerns about how Policy SP8 interacts with the rest of the strategy, especially outside the Strategic Growth Area.
The Deposit Plan confirms that, within Primary and Minor Rural Settlements, new development will generally be required to provide 40% affordable housing. It also confirms that outside delineated settlement boundaries proposals for additional housing will be strictly controlled and limited to affordable housing exception sites or housing in support of rural enterprises. The Plan then layers on the separate affordable housing-led model under Policy HG4, where a minimum of 50% affordable housing is required.
In principle, Barratt Redrow has no issue with seeking ambitious affordable housing delivery where supported by viability evidence. The concern is that the overall strategy becomes too rigid when SP8 is read alongside SP2, SP3, HG4 and other potentially onerous policy requirements, including Policy CC1. In practice, this risks leaving sustainable settlements such as St Nicholas with very little scope to contribute to general housing delivery unless schemes meet a highly demanding affordable-led model. That is not a balanced or flexible way to plan for rural communities. It also gives rise to a lack of clarity between Policies SP7 and SP8 which should be addressed. Policy SP7 states that the mix of affordable housing to be delivered over the plan period will be "informed" by the LHMA, waiting list data and the Older Persons Housing Strategy, but it is unclear whether that is intended simply as a starting point for negotiation or whether the Council expects the identified mix to be applied more prescriptively. By contrast, Policy SP8 expressly provides greater flexibility: it states that affordable housing will be negotiated on a site-by-site basis having regard to evidenced viability, that the exact mix of affordable housing will be considered on a case-by-case basis having regard to the Council's latest needs evidence, and that where proven economic circumstances affect delivery the Council may negotiate the level, type, tenure and nature of provision. In our view, those two policies should be aligned. That would better reflect Planning Policy Wales, which requires planning authorities to develop evidence-based market and affordable housing policies, but also makes clear that affordable housing targets and policy expectations must take account of deliverability and viability considerations. In that context, Policy SP7 should be clarified so that the LHMA and related evidence are expressly treated as guiding the starting point for discussions on mix, rather than imposing a fixed outcome irrespective of site-specific circumstances, technical constraints, abnormal costs or viability. That is especially important given the Deposit Plan's blanket affordable housing percentages across the Vale and the cumulative effect of other policy requirements, which may affect the deliverability of particular allocations and should therefore be capable of being addressed on a site-by-site basis.The Deposit Plan recognises that an appropriate mix of affordable housing will be required, and that in the rural Vale there is a desire for smaller market homes as well as affordable homes. It also accepts that affordable housing delivery may be lower than anticipated because of viability constraints and that, where proven economic circumstances affect delivery, the Council may negotiate the level, type, tenure and nature of provision. This should feed through into a more flexible strategy overall. In particular, the Plan should not be read or applied in a way that suppresses the delivery of mixed-tenure schemes in sustainable rural settlements where those schemes can contribute both market and affordable housing and support local services. That is especially so given the evidence in the LHMA that a range of tenures is required and that intermediate and low-cost home ownership products are an increasingly important part of the housing response.
8. Policy HG1 / Housing Allocations and overall supply portfolio Position: Comment / Object in part
Barratt Redrow does not object in principle to the Council allocating key sites and other strategic locations. However, there remains a significant concern that the Plan is overly reliant on a relatively narrow supply portfolio.
The Deposit Plan confirms that the allocation component of supply comprises 2,278 dwellings on key sites, 959 dwellings on rolled forward sites, 161 dwellings on new housing allocations and 122 dwellings on affordable housing-led sites. It also confirms that 1,303 dwellings are expected from windfalls. That means a large proportion of the Plan's supply is tied up either in a small number of large sites, historic carry-over, or a substantial assumption about unallocated windfall delivery.
Our earlier Preferred Strategy reps raised exactly this issue and those points should all be carried forward. In particular:
• the Plan is overly reliant on a small number of key sites;
• medium-sized sites in sustainable locations can provide resilience to the housing trajectory;
• windfalls account for a significant proportion of the supply and provide less certainty over geographical distribution and delivery; and
• rolled forward allocations require careful justification if they are to be relied upon as part of the plan's effective provision.
The Deposit Plan's own figures support that concern. It states that only a small proportion of development is likely to take place outside of the Strategic Growth Area, with some of this reflecting permissions granted under the adopted strategy. It also shows that the total housing provision attributable to Minor Rural Settlements and Primary Settlements outside the Strategic Growth Area is only 390 dwellings. In our view that is too low, particularly given the evidence that some of those settlements perform relatively well and can help diversify the supply portfolio.
Based on the revised RLDP Delivery Agreement, should there be no further slippage the RLDP will be adopted in September 2027 with there being some 7 years before the end of the plan period (of 2034) post-adoption. There may of course be some slippage in the adoption of the RLDP. We therefore would query whether the quantum of homes proposed on the larger Key Sites can realistically be delivered within the plan period.
The following conclusions of Lichfield's Start to Finish (2nd Edition, Feb 2020) research are relevant in this respect:
• From the date at which an outline application is validated, the average figures can be 5.0-8.4 years for the first home to be delivered.
• If a scheme of more than 500 dwellings has an outline permission, then on average it delivers its first home in circa 3 years.
• The average build out rate of sites between 500-999 dwellings is 68 homes per annum and 107 homes per annum for

sites between 1,000 and 1,499 dwellings.
All of the Key Sites have no outline application having been submitted. Given the revocation of TAN 1 and Welsh Government's emphasis on a plan led system, the very earliest that the Key Sites could have outline permission in place would be post-adoption of the plan limiting its housing land supply contribution within the early years of the plan period. Allowing for an appropriate amount of time to secure necessary permissions, consents and infrastructure delivery, the Key Sites' contribution to housing supply within the plan period would fall significantly below the quantum currently assumed in the Preferred Strategy. In that context, it is all the more important that sustainable and deliverable medium-sized sites are included in the Plan where appropriate. Again, St Nicholas is an obvious example.
In short, the issue is not that key sites should not exist. It is that the current portfolio is not broad enough and not resilient enough. The Plan should be strengthened through the inclusion of additional medium-sized, sustainable allocations capable of delivery within the plan period.
Policy HG4 – Rural Affordable Housing Led Sites Position: Support in principle / Object in part
Barratt Redrow supports the principle of identifying rural affordable housing-led sites. It is entirely appropriate that the RLDP seeks to respond to local housing need in rural communities and to secure affordable provision in settlements where opportunities may otherwise be more limited.
However, Policy HG4 also illustrates the broader weakness in the Plan's current rural strategy. The Deposit Plan allocates four affordable housing-led sites at Colwinston, Aberthin, Wick and Fferm Goch, totalling 122 dwellings. It also requires applicants to demonstrate how both the market and affordable housing on those sites will meet local housing needs in terms of tenure, type and size, so that a range of housing is delivered to meet different groups in the community. The supporting text then expressly notes that Planning Policy Wales requires a sufficient number of sites suitable for the full range of housing types, and that in the rural Vale there is demand for smaller market homes as well as affordable homes.
Those are important statements and, in our view, they assist the case being made here. They show that the Council itself accepts that rural settlements need a range and choice of homes, not just affordable housing in isolation. They also show that some open market housing in rural locations is not only acceptable, but in fact part of how mixed communities and affordable delivery are achieved.
The problem is that the strategy remains too narrow in how it applies that logic. The Plan effectively says that outside the Strategic Growth Area, growth should generally be confined to affordable-led schemes with a minimum 50% affordable requirement, and anything below that will not be supported. In our view that is too rigid and may well suppress otherwise sustainable and beneficial development, particularly where sites are capable of delivering a strong policy-compliant affordable contribution but not necessarily the precise affordable-led model the Council has chosen.
We continue to raise concerns that a blanket 50% affordable requirement could create deliverability issues, including reliance on complex developer/RSL arrangements and a level of uncertainty around funding and market conditions. Without repeating every operational point, the central planning concern remains valid: the strategy should not be so rigid that it prevents settlements from growing and adapting in a sustainable way. This is especially the case given the ever more challenging delivery context set by increasingly onerous policy requirements.
St Nicholas is relevant here because it demonstrates the missed opportunity in the current approach. The village is expressly identified by the Council as one of the smaller rural settlements with a primary school serving a wider catchment area. It performs well in the settlement appraisal and is the sort of place where a sensitive mixed-tenure allocation could help support local services, provide both market and affordable housing, and diversify the Plan's supply. In our view, the omission of St Nicholas from the rural housing strategy is not justified by the evidence currently before the Council.
Policy CC1 – Residential Operational Net Zero Carbon Development Position: Object
Barratt Redrow supports the wider objective of improving the energy performance of new homes and reducing carbon emissions from development. However, Policy CC1 in its current form gives rise to a number of concerns regarding consistency with national standards, deliverability, viability and practical implementation. The Deposit Plan is explicit that Policy CC1 is intended to require new dwellings to exceed current Building Regulations standards. Welsh Government's own sustainable buildings guidance confirms that Building Regulations set mandatory standards for the design and construction of buildings, including environmental performance. In our view, that raises a legitimate question as to whether an additional local policy layer of this kind is necessary or proportionate, particularly where it risks inconsistency across local planning authorities and may duplicate, or move ahead of, the national regulatory framework.
There is also a need for greater precision in the policy wording itself. As drafted, Policy CC1 requires development to provide on-site renewable electricity generation equivalent to at least the annual energy consumption of the development, assessed through an energy performance model. The supporting text explains that the relevant metric is Energy Use Intensity, which measures all energy consumed by the building. If the policy approach is to be progressed, the policy should make clear that compliance relates only to regulated energy use, consistent with Building Regulations methodology. Developers can influence the performance of the building fabric and regulated building services, but they cannot control future occupant behaviour, appliance use, plug loads or other forms of unregulated energy demand. Without that clarification, there is a risk that the policy extends beyond matters that can reasonably and consistently be secured through the planning process.
A further issue is that the policy should expressly allow its requirements to fall away, or be treated as satisfied, where national Building Regulations subsequently catch up with or exceed the standards sought under Policy CC1, or where the national regime adopts a different but equivalent methodology. Without such a safeguard, there is a real risk that the RLDP imposes outdated or duplicative requirements later in the plan period, which would not only create unnecessary complexity but could also compromise the delivery of much-needed housing. That concern is heightened by the cumulative policy burden elsewhere in the Plan, including affordable housing, open space, placemaking, green infrastructure and other low carbon requirements. In our view, the Council should therefore demonstrate, through its viability work, that the housing allocations in Policy HG1 are capable of absorbing the cumulative costs of Policy CC1

alongside the wider requirements of the RLDP.
Clarification is also required in relation to the fallback Project Zero Fund contribution. The Deposit Plan states that where it is not technically feasible to provide a policy-compliant level of renewable energy on site, the residual energy is to be offset through an appropriate contribution to the Council's Project Zero Fund "as far as economic viability allows", with further detail to be provided in SPG. In our view, that is presently too uncertain. The policy should make clear how any such contribution will be calculated, what assumptions will be used, what evidence will be required, and how viability will be taken into account. These are all matters which go directly to deliverability and should not be left entirely to post-adoption guidance.
In summary, Building Regulations are sufficient to achieve Welsh Government's objectives for improving energy efficiency and delivering net-zero carbon development. Additional local policy requirements risk creating inconsistency across Local Planning Authorities and may exceed what is necessary to align with national policy. If a local approach is to be taken, as a minimum, Policy CC1 should be amended so that: (i) it applies only to regulated energy use; (ii) its requirements fall away, or are deemed satisfied, where Building Regulations subsequently meet or exceed them or adopt an alternative national methodology; and (iii) the policy and supporting text provide a clearer framework for viability, Project Zero contributions and practical implementation.
Policy CI1 – Open Space Provision
Position: Support in principle / Object in part
Barratt Redrow supports the objective of ensuring that new development makes appropriate provision for open space and recreation. That is entirely consistent with good placemaking and with national policy support for healthy, inclusive and green environments. However, Policy CI1 as drafted is overly prescriptive and, in our view, requires amendment to provide greater flexibility and to better reflect local context and design-led principles.
The main concern is the way in which the policy translates the Fields in Trust benchmarks into a rigid per-dwelling requirement of 62.2 sq m per dwelling. The Deposit Plan itself recognises, at paragraph 6.233, that on-site provision should be design led rather than standards led, and that the type of provision should respond to local context and identified local need having regard to the Open Space Background Paper. That is an important and sensible acknowledgement. In our view, however, the policy wording pulls in the opposite direction by setting out what reads in practice as a uniform quantitative requirement. Fields in Trust guidance is ordinarily framed around population and typologies, to be applied strategically and flexibly, rather than as a blanket per-dwelling metric irrespective of scheme context, form and composition. A rigid application of the standard risks disproportionate land take, unnecessary design constraints and, ultimately, pressure on viability and delivery.
There is also concern regarding the separate requirement for an Open Space Strategy for all housing and commercial developments meeting the thresholds. In many cases, the provision of open space within a development will already be addressed through the Design and Access Statement, Green Infrastructure Statement and the overall layout and placemaking rationale of the scheme. We would therefore question whether a standalone Open Space Strategy is necessary in every case. In our view, the policy should be amended so that open space can be addressed through the principal design and green infrastructure material submitted with the application, unless there is a particular site-specific reason why a separate strategy is required. That would avoid unnecessary duplication without weakening the quality of assessment.
Change sought: amend Policy CI1 and supporting text to make clear that the benchmark standards are to be applied flexibly and strategically, having regard to site context, typology and local need, and that open space provision may be addressed through the Design and Access Statement and/or Green Infrastructure material rather than requiring a standalone Open Space Strategy in every case.
Policy SP4 – Placemaking
Position: Support in principle / Comment
Barratt Redrow supports Policy SP4 in principle. The emphasis on placemaking is fully consistent with Planning Policy Wales and with the Deposit Plan's wider design-led approach to development. The policy framework rightly seeks to ensure that major development is shaped by the placemaking principles from the outset.
That said, the wording of the policy should better reflect the position already set out in the supporting text. Paragraph 6.34 of the Deposit Plan makes clear that the required Placemaking Statement should form part of the Design and Access Statement for most major planning applications. That is helpful and sensible. In our view, the policy itself should say the same thing expressly, so that there is no suggestion that applicants are expected to prepare a separate freestanding document in addition to the DAS.
Suggested wording amendment:
"Major development proposals must be supported by a Placemaking Statement, to be incorporated within the Design and Access Statement where one is required, demonstrating clearly how the proposal accords with the placemaking principles of the Plan."
That amendment would improve clarity, avoid duplication and align the policy wording with paragraph 6.34 of the supporting text.
Policy SP5 – Creating Healthy and Inclusive Places and Spaces Position: Support in principle / Comment in part
Barratt Redrow supports the objective of creating healthy and inclusive places and spaces and agrees that health and well-being are legitimate and important planning considerations. The wider thrust of Policy SP5 is consistent with PPW's placemaking agenda and with the Deposit Plan's recognition that the built environment can have a significant influence on health outcomes.
However, there is a need to ensure that the assessment requirements under Policy SP5 are proportionate and do not create unnecessary cost and duplication. The policy requires all qualifying major development to undertake screening at pre-application stage and, for significant developments, a rapid Health Impact Assessment. The supporting text explains that a rapid HIA may involve literature review, stakeholder engagement and wider evidence gathering. In our view, whilst that may be appropriate for larger or more complex schemes, the policy should recognise more clearly that the health

implications of development will often already be addressed through the Design and Access Statement, Placemaking Statement, Green Infrastructure material, Transport Assessment and related application documents. There is a risk that the current wording adds a further procedural burden, with associated cost implications, without always adding materially new value.
We therefore consider that the policy should be applied proportionately, with the checklist and any rapid HIA focused on developments where there is a realistic prospect of significant or complex health implications, rather than as a routine additional requirement in every qualifying case. The policy would also benefit from clarification that the conclusions of the screening/HIA can be incorporated into the main design and supporting statements submitted with the application, rather than requiring standalone reporting unless specifically justified by the scale or sensitivity of the proposal.
Change sought: amend Policy SP5 and/or its supporting text to confirm that health assessment requirements will be applied proportionately, and that the outcomes of the checklist or rapid HIA may be integrated within other application documents, including the Design and Access Statement, Placemaking Statement and Green Infrastructure material, unless a standalone report is specifically justified.
Policy CC2 – Presumption Against Demolition Position: Support in principle / Object in part
Barratt Redrow supports the broad objective of encouraging the repair, refurbishment, re-use and re-purposing of existing buildings where that represents the most sustainable outcome. The policy's underlying intent, to avoid unnecessary loss of embodied carbon and encourage circular economy principles, is understood.
Nevertheless, Policy CC2 as drafted is overly onerous and risks giving rise to unintended consequences for deliverability. The policy establishes a strong presumption against demolition and requires extensive justification through either a Demolition Statement or an Energy Report / Whole Life Carbon Assessment. Whilst that may be appropriate in certain cases, a blanket presumption of this kind risks frustrating otherwise sustainable redevelopment proposals, including proposals involving poor quality farm buildings, obsolete structures, and buildings that are not well suited to modern standards of layout, accessibility, thermal performance or efficient land use. In some cases, insisting on retention or retrofit may not represent the most sustainable outcome overall.
There is also a tension with the wider objective of making the most effective and efficient use of land. Some buildings may be technically capable of retention, but only at disproportionate cost, with compromised design outcomes or reduced site efficiency. On previously developed or rural redevelopment sites alike, that could affect development timescales, viability and ultimately the ability to bring forward policy-compliant schemes. The policy does contain some flexibility through criteria 3 and 4, which recognise that a lower net carbon solution may in some circumstances arise from demolition and redevelopment. However, in our view, the overall wording still leans too heavily towards a presumption against demolition rather than a balanced assessment of the most sustainable whole-life outcome in each case.
The policy would therefore benefit from a more balanced formulation which supports retention and reuse where appropriate, but does not create a disproportionate barrier to demolition where redevelopment would deliver a better placemaking, operational carbon, viability or land-use outcome. That is particularly important in relation to sites containing redundant agricultural or rural buildings, and sites where retrofit would be impractical, inefficient or environmentally sub-optimal.
Change sought: amend Policy CC2 so that it supports the retention and re-use of existing buildings where feasible and sustainable, but allows demolition where this would deliver a more effective overall development outcome having regard to whole-life carbon, operational performance, design quality, viability, land efficiency and deliverability.
Land at St Nicholas / omission from the Deposit Plan Position: Object to omission
Barratt Redrow objects to the omission of land at St Nicholas from the Deposit Plan.
The case for St Nicholas is, in our view, strong and is rooted in the Council's own evidence base. As already noted, the settlement performs strongly in the BP5 appraisal, the adopted LDP and current review both identify the role of minor rural settlements in supporting sustainable communities, and both the adopted LDP and the current Deposit Plan recognise the specific significance of St Nicholas as a village with a primary school serving a wider catchment area.
Deposit Plan Conclusion
Overall, Barratt Redrow is supportive of the Council's continued work in preparing the RLDP and supports the objective of putting in place a robust, plan-led framework for growth in the Vale of Glamorgan. However, the Plan in its current form is not sufficiently ambitious and requires modification in order to be sound.
In particular:
• The Plan Period is too short. An extended plan period (and associated increase in housing requirement) is required to provide for at least ten years post adoption;
• the housing requirement under Policy SP6 is too low and is too closely tied to past build rates;
• the 10% flexibility allowance is not sufficient given the structure and risk profile of the supply;
• the Plan relies too heavily on key sites, rolled forward sites and windfalls;
• the strategy for settlements outside the Strategic Growth Area is too restrictive and does not properly reflect the evidence on bus-connected, serviceable and functionally linked settlements; and
• the omission of St Nicholas is not justified by the Council's own evidence base.
The evidence before the Council supports a stronger role for St Nicholas. The adopted LDP and current BP5 review both recognise the role of Minor Rural Settlements in supporting sustainable rural communities and providing for moderate growth. The Deposit Plan itself acknowledges St Nicholas' role as a settlement with a primary school serving a wider catchment area. The LHMA demonstrates that there is a need for a range of housing products and tenures, and the Deposit Plan itself accepts that rural areas require both affordable and market housing to meet local needs.
For those reasons, Barratt Redrow seeks amendments to Policies SP1, SP2, SP6, SP7, SP8 and HG4, together with a more flexible and resilient housing strategy overall, and the inclusion of land at St Nicholas as an appropriate and deliverable source of mixed-tenure housing growth within the RLDP period.
Candidate Site Register - Site ID 486

Land to the south of the A48 at St Nicholas (Site ID 486) is being promoted by Barratt Redrow for a residential-led development.

Stage 2 Candidate Site Assessment

The Council's Stage 2 Candidate Site Assessment states:

"The development would have an adverse impact on the character and setting of the St Nicholas Conservation Area and would also be considered to represent an unacceptable intrusion in to the open countryside. Predictive Agricultural Land Classification Map indicates that the site is Grade 3a agricultural land loss of this land would be contrary to national policy."

The key issues raised are all capable of being overcome as part of the ongoing promotion of the site, as set out below:

Impact upon Character and Setting of the St Nicholas Conservation Area

Wessex Archaeology have prepared a Heritage Appraisal in support of the site's development. This concludes that future development within the site would unlikely cause harm to the significance of the designated heritage assets if the development is in keeping with the surrounding built character.

The impact upon the character and setting of the St Nicholas Conservation Area is considered acceptable and the site is considered to be the best option to accommodate the growth of St Nicholas in a sensitive manner, particularly with regard to the following:

• The Site is located outside of the Conservation Area whereas other fields outside the settlement boundary (e.g. to the south of The Manor House) are within the Conservation Area;

• The Conservation Area covers the majority of St Nicholas and most options for the village's growth would be within its setting;

• PPW Para. 6.5.22 advises that proposals should be tested against a Conservation Area Appraisal where they are available. The St Nicholas Conservation Area Appraisal does not identify any features or important characteristics on the candidate site; and

• The proposals for the site are being developed so that they are sensitively designed, in keeping with the surrounding built character and retain important landscape features and views beyond the site.

Countryside Impacts

The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on key receptors, the landscape character and types within the proposed site and its surrounds, with the inclusion of appropriate green infrastructure enhancement and mitigation.

The emerging proposals have been underpinned by existing landscape features, with green infrastructure areas and landscape edges proposed within and around the site. New parkland and amenity spaces, footpaths along with a network of sustainable drainage features are incorporated with tree planting proposed throughout. It is accordingly considered that the proposals will sit well within the receiving landscape with limited impacts beyond its immediate setting.

Agricultural Land Quality

Technical Advice Note (TAN) 6 notes that agricultural land within Grades 1, 2, and 3a are considered to be the "most flexible, productive and efficient land in terms of output". Paragraph 3.59 of PPW sets out the search sequence when considering allocating land within LDPs stating that poorer quality agricultural land should be considered ahead of higher quality land. Accordingly, whilst the site comprises Grade 3a agricultural land quality based on the currently available survey data, it comprises the poorest quality of other options for growth around St Nicholas. There is an overriding need for housing growth as part of the preparation of the RLDP and the allocation of the site would accord with the search sequence set out in PPW.

As the proposals for the site develop further, there is scope to include allotments/community growing areas and open space areas allowing much of the very good quality soils to be retained. The soils that are retained on site in the open spaces and gardens will still be able to provide various ecosystem functions, particularly in the support of biodiversity, and water and carbon storage.

Appendix 2 – Summary of Assessment

We comment on the Council's Summary of Assessment as follows:

• Developer Interest: should be amended from red to green. The site is under single positive control by Barratt Redrow who have a track record of successfully developing residential-led sites within the Vale of Glamorgan.

• Historic Environment: should be amended from red to green. The site and proposal's potential impact upon the historic environment is outlined within the candidate site submission and earlier within these representations as being acceptable.

• Special Landscape Area and Glamorgan Heritage Coast Designations: should be amended from red to green. The Urbanists have undertaken a Landscape and Visual Appraisal in support of the site's development. It concludes that the site could be developed without causing unacceptable visual impacts on these designations.

• Environmental & Physical Constraints Conclusions: should be amended from red to green. The site is not subject to any environmental or physical constraints which cannot be accommodated through the sensitive design approach adopted by Barrat Redrow.

• Access/proximity to services and facilities conclusions: should be amended from amber to green. The Transport Appraisal which formed part of the candidate site submission evidences the site's accessibility and proximity to services and facilities.

• Connectivity and Capacity: should be amended from red to green. The candidate site submission demonstrates the site's capacity for the quantum of development proposed and its connectivity to the settlement and other key locations in the Vale of Glamorgan via sustainable transport modes.

• Climate Change: should be amended from red to green. The site is in a sustainable location, with a number of local facilities including a bus stop, a school, health and wellbeing facilities all within a short walk from the site as well as the

retail facilities situated within acceptable cycling distances site and highly accessible by public transport. Overall, the accessible location of the development will mean that there is a reduced need for private car journeys, in turn reducing overall pollution. The development will be supported by a Travel Plan in favour of sustainable modes of travel. Moreover, the dwellings will be built to Part L 2025 which means the new homes will produce reduced levels of CO2.
• Placemaking Character and Place: should be amended from red to green. The proposals comply with the National Sustainable Placemaking Outcomes, as set out within the Appraisal which formed part of the candidate site submission.
• Suitable for Further Consideration: should be amended from red to green for the reasons set out below and within the candidate site submission.
Suitability for Allocation and Key Benefits
For the sake of brevity, we do not intend to repeat the considerable and detailed content of the Candidate Site Submission here. The previously submitted information however contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal undertaken in accordance with PPW. In summary, the submission demonstrated that the site is suitable for allocation within the Council's RLDP and its inclusion would help contribute to the overall soundness of the emerging Plan. The proposed site fully accords with National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the site is considered to be deliverable and viable.
The proposed development of the site would deliver the following key benefits:
• Delivering a range and choice of housing (including a proportion of affordable housing) in a sustainable location on a deliverable site which can contribute towards the resilience of the RLDP's housing trajectory and the effectiveness of the Plan;
• The proposals would support the vibrancy of St Nicholas with the site being closely related to the settlement and capable of integrating effectively with the settlement to the benefit of existing and proposed residents;
• The provision of multi-functional open space – including amenity space for residents, play spaces, potential for local growing spaces, nature walks, sustainable drainage and wildlife habitats to achieve biodiversity enhancements;
• Encouraging and supporting active travel with cleaner, greener travel choices and reduced out commuting being located close to public transport provision;
• Good quality open spaces with significant biodiversity benefits (delivering a biodiversity enhancement), surface water resilience and efficient energy, water and communications infrastructure;
• Economic benefits – including that the proposed development is expected to:
o Support the employment of 434 people;
o Create circa £1,687,420 in additional tax, including £158,124 in council tax revenue for the Vale of Glamorgan Council.
It is accordingly concluded that allocation of the site would contribute to the soundness of the RLDP and would accord with the well-being goals specified in the Well-being of Future Generations (Wales) Act 2015.
Barratt Redrow, Highlight Planning and the project team are keen to work collaboratively with the Council and other parties to demonstrate the suitability of the land for development and its identification as an allocation in the RLDP.
I trust the above representations assist in the Council's preparation of the RLDP. We would welcome the opportunity to discuss the above matters with the Council if that would be helpful. If you have any queries please do not hesitate to contact us.

Change suggested by respondent:

Amend CC2.

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gk
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gm
Email Representation - https://valeofglamorgan.oc2.uk/a/3gn

7215 Support

Document Element: CC2 - Presumption Against Demolition

Respondent: Penarth Town Council (Mr Pete Newton, Principal Policy, Innovation and Development Officer) [1125]

Summary:

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Full text:

Penarth Town Council Deposit RLDP Consultation Response

Comments collated at a meeting of the Council's Consultation Task and Finish Group on 9th February 2026

Some Members attended the RLDP consultation drop-in session in Penarth and in general found it to be very informative.

Members support the general development strategy but did note the lack of information concerning discussions with adjacent and other nearby Principal Councils in the CJC Region. In view of the forthcoming Strategic Development Plan, encompassing the ten authorities, members felt that some further commentary regarding this is warranted.1

It is clear that the approach taken in the Cardiff paper is still that ideally, each Council is self-contained and "consumes its own smoke," which does not show any wider strategic thinking between the ten authorities in preparation for a regional Strategic Development Plan.

Members agreed with the view that infrastructure to support new housing developments was required in order to create successful developments, although they acknowledged that logistically it was difficult to pre-empt demand for some services such as travel and health services. Members also noted that predicting developmental needs and opportunities within wider context surrounding the UK's economic, political, and social landscapes.

Members noted that there was not much focus on Penarth or identified potential future development for Penarth beyond that already underway at the location near to Cosmeston but welcomed flexibility in its approach. Members expected to be more closely involved in the decisions and planning of this, and other such developments, and provide opportunity for wider consultation where appropriate, such as pre-application consultations, as well as would expect to be included in consultations concerning sites adjacent to Llandough, Dinas Powys, and Sully given their impact upon the town.

Penarth as a town is currently developed to its boundaries, save for the development at Cosmeston. It is, therefore, more dependent than other Service Centres on windfalls of land or buildings which may arise during the currency of the Plan. In 2023, an extensive assessment of the potential of the town concluded the following:

"There is marginally less capacity in Penarth [and Llandough] than the projected figures. However, this does not mean that the projections are incorrect or unjustifiable. The reported figures have not included a significant amount of capacity on open space land, and the projected figures for conversion of existing buildings and intensifications will be surpassed if the extant consents that exist this early in the Plan period are implemented."

The degree of flexibility, however, is substantially depending on one large site. P009, Headland School, is identified as both a potentially disused building and as a site with a capacity of 111-120 units. This special school is full to capacity and used by many Council in both Wales and England.

Members did note the inclusion of Cogan Transport Interchange under section 6.196 but would have liked to see more information about its future developments as they see it as key to increasing public transport use to Barry and further to West Wales in general.

Members wished to advise that issues with both the bridge and the platforms at Cogan have been long term, with accessibility being central to these issues. Members felt that improvements to accessibility should be a priority at this site, with planting and landscaping considered secondary to this.

Members felt it was key to consider the additional stress on Penarth from increased anticipated demand of public transport needs and emphasised the need for this to be aptly considered by bus route providers as part of development work.

Members wanted to see a strategy that actively protects the town's heritage and culture whilst still being able to provide for current and future generations.

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16 and section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report2, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Under CC2, it was noted that the presumption against demolition3 in favour of retrofit and reuse may constrain maximum transition to net zero as, whilst there is grant aid available for public buildings and social housing, the retrofit monies available for private stock is limited.

Additional considerations will also need to be made as part of the Third Carbon Budget (2026-2030), Local Area Energy Plans and the climate change ISA theme.

Members also felt similar about the inclusion and consideration of sustainable development through the specific strategy outlined in section 5 of the document and felt this linked in well with ongoing Placemaking work and its strategic approach as detailed in SP4.

Members were pleased to see mention of the diversification of high streets, although noted that Penarth was above average in terms of occupancy. They hoped that the RLDP would be able to support the town centre and support other ways it could be improved, such as a fishmonger or identifying a site for a new Cemetery.

With Penarth classified as a Service Centre, they are identified as having a defined role. However, the decline of in-person retailing means that defining role is not that evident, and Members felt there is potentially a need to move away from the traditional retail role of Town Centres in favour of "repurposing, creating multifunctional, commercial, and service centres that meet the needs of the communities they serve" in line with Future Wales Town Centre First Policy. The term 'repurposing' suggests a stronger role for the public sector in enabling these new purposes, and Members felt that Placemaking Plans could be one potential framework for this.

Members felt that potential functional support that could be provided could include:
• The appointment of a Town Centre Manager
• Using supporting interventions such as an extension or reshaping of normal services such as Neighbourhood Services.
• Using existing or emerging new powers, such as compulsory purchases.

Members wished for the RLDP to facilitate the safeguarding of essential public services, including health, policing, fire and rescue in the town, which would help to develop the defining role of a Service Centre, and felt that specific reference to these would be beneficial.

Members supported the avoidance of coalescence with adjacent settlements through the reconfirmation of Green Wedges as it allows for relevant extensions to those settlements whilst allowing them to retain their identity.

Members noted that the Quiet Area provision under DNP6 only applies to Penarth and wished to know why this was the case.

Members advised that they welcomed further opportunity for consultation, particularly in relation to developments in the neighbouring Cardiff Bay area whilst acknowledging that this is not necessarily an RLDP concern.

Footnotes

1 There is an evidence paper concerning relations with Cardiff and a Statement of Common Ground with Bridgend. However, there is only a reference in the RLDP text to discussions with other regional Councils and not the paper itself. We would be grateful if you could provide the paper as it does impact on the soundness of this Plan.

2The UK Climate Change Committee's 'Progress Report: Reducing Emissions in Wales' highlighted the following aspects of import: Skills, Vehicle Charging Networks, Improving Recycling, Energy Plans, Decarbonising Public Buildings and Social Housing, and reducing Road transport Demand (Car-Kilometres).

3The UK Environmental Audit Committee (2022) noted that "the evidence we received consistently recommended that retrofit and reuse be prioritised over new build."

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3d5

7216 Comment

Document Element: CC2 - Presumption Against Demolition

Respondent: Penarth Town Council (Mr Pete Newton, Principal Policy, Innovation and Development Officer) [1125]

Summary:

Under CC2, it was noted that the presumption against demolition in favour of retrofit and reuse may constrain maximum transition to net zero as, whilst there is grant aid available for public buildings and social housing, the retrofit monies available for private stock is limited.

Full text:

Penarth Town Council Deposit RLDP Consultation Response

Comments collated at a meeting of the Council's Consultation Task and Finish Group on 9th February 2026

Some Members attended the RLDP consultation drop-in session in Penarth and in general found it to be very informative.

Members support the general development strategy but did note the lack of information concerning discussions with adjacent and other nearby Principal Councils in the CJC Region. In view of the forthcoming Strategic Development Plan, encompassing the ten authorities, members felt that some further commentary regarding this is warranted.1

It is clear that the approach taken in the Cardiff paper is still that ideally, each Council is self-contained and "consumes

its own smoke," which does not show any wider strategic thinking between the ten authorities in preparation for a regional Strategic Development Plan.

Members agreed with the view that infrastructure to support new housing developments was required in order to create successful developments, although they acknowledged that logistically it was difficult to pre-empt demand for some services such as travel and health services. Members also noted that predicting developmental needs and opportunities within wider context surrounding the UK's economic, political, and social landscapes.

Members noted that there was not much focus on Penarth or identified potential future development for Penarth beyond that already underway at the location near to Cosmeston but welcomed flexibility in its approach. Members expected to be more closely involved in the decisions and planning of this, and other such developments, and provide opportunity for wider consultation where appropriate, such as pre-application consultations, as well as would expect to be included in consultations concerning sites adjacent to Llandough, Dinas Powys, and Sully given their impact upon the town.

Penarth as a town is currently developed to its boundaries, save for the development at Cosmeston. It is, therefore, more dependent than other Service Centres on windfalls of land or buildings which may arise during the currency of the Plan. In 2023, an extensive assessment of the potential of the town concluded the following:

"There is marginally less capacity in Penarth [and Llandough] than the projected figures. However, this does not mean that the projections are incorrect or unjustifiable. The reported figures have not included a significant amount of capacity on open space land, and the projected figures for conversion of existing buildings and intensifications will be surpassed if the extant consents that exist this early in the Plan period are implemented."

The degree of flexibility, however, is substantially depending on one large site. P009, Headland School, is identified as both a potentially disused building and as a site with a capacity of 111-120 units. This special school is full to capacity and used by many Council in both Wales and England.

Members did note the inclusion of Cogan Transport Interchange under section 6.196 but would have liked to see more information about its future developments as they see it as key to increasing public transport use to Barry and further to West Wales in general.

Members wished to advise that issues with both the bridge and the platforms at Cogan have been long term, with accessibility being central to these issues. Members felt that improvements to accessibility should be a priority at this site, with planting and landscaping considered secondary to this.

Members felt it was key to consider the additional stress on Penarth from increased anticipated demand of public transport needs and emphasised the need for this to be aptly considered by bus route providers as part of development work.

Members wanted to see a strategy that actively protects the town's heritage and culture whilst still being able to provide for current and future generations.

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16 and section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report2, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Under CC2, it was noted that the presumption against demolition3 in favour of retrofit and reuse may constrain maximum transition to net zero as, whilst there is grant aid available for public buildings and social housing, the retrofit monies available for private stock is limited.

Additional considerations will also need to be made as part of the Third Carbon Budget (2026-2030), Local Area Energy Plans and the climate change ISA theme.

Members also felt similar about the inclusion and consideration of sustainable development through the specific strategy outlined in section 5 of the document and felt this linked in well with ongoing Placemaking work and its strategic approach as detailed in SP4.

Members were pleased to see mention of the diversification of high streets, although noted that Penarth was above average in terms of occupancy. They hoped that the RLDP would be able to support the town centre and support other ways it could be improved, such as a fishmonger or identifying a site for a new Cemetery.

With Penarth classified as a Service Centre, they are identified as having a defined role. However, the decline of in-person retailing means that defining role is not that evident, and Members felt there is potentially a need to move away from the traditional retail role of Town Centres in favour of "repurposing, creating multifunctional, commercial, and service centres that meet the needs of the communities they serve" in line with Future Wales Town Centre First Policy. The term

'repurposing' suggests a stronger role for the public sector in enabling these new purposes, and Members felt that Placemaking Plans could be one potential framework for this.

Members felt that potential functional support that could be provided could include:
• The appointment of a Town Centre Manager
• Using supporting interventions such as an extension or reshaping of normal services such as Neighbourhood Services.
• Using existing or emerging new powers, such as compulsory purchases.

Members wished for the RLDP to facilitate the safeguarding of essential public services, including health, policing, fire and rescue in the town, which would help to develop the defining role of a Service Centre, and felt that specific reference to these would be beneficial.

Members supported the avoidance of coalescence with adjacent settlements through the reconfirmation of Green Wedges as it allows for relevant extensions to those settlements whilst allowing them to retain their identity.

Members noted that the Quiet Area provision under DNP6 only applies to Penarth and wished to know why this was the case.

Members advised that they welcomed further opportunity for consultation, particularly in relation to developments in the neighbouring Cardiff Bay area whilst acknowledging that this is not necessarily an RLDP concern.

Footnotes

1 There is an evidence paper concerning relations with Cardiff and a Statement of Common Ground with Bridgend. However, there is only a reference in the RLDP text to discussions with other regional Councils and not the paper itself. We would be grateful if you could provide the paper as it does impact on the soundness of this Plan.

2The UK Climate Change Committee's 'Progress Report: Reducing Emissions in Wales' highlighted the following aspects of import: Skills, Vehicle Charging Networks, Improving Recycling, Energy Plans, Decarbonising Public Buildings and Social Housing, and reducing Road transport Demand (Car-Kilometres).

3The UK Environmental Audit Committee (2022) noted that "the evidence we received consistently recommended that retrofit and reuse be prioritised over new build."

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3d5

4798 Object

Document Element: CC3 - Renewable Energy Local Search Areas

Respondent: Mr Rob G Thomas [683]

Summary:

Solar locations stated as East of Colwinston, North of Llysworney, North West of Llysworney

Industrialisation of The Countryside
Impact on Visual Amenities
Impact on Food Security
Impact on Colwinston and Llysworney Landscape and infrastructure
Visual impact
Impact on sites of importance for nature conservation being Ty Draw South of Colwinston Policy SP20 SINC id 147
Impact of Site Special Landscape area (2) Upper and Lower Thaw Valley policies DNP1 (2)
No DNO apparatus or Supply
No National Grid connection or availability
Impact on Landscape with additional poles, pylons and electrical facilities along with associated roads, fencing, security and monitoring units
Removal and withdrawn use of BMV Agricultural land under ALC predictive map Wales grades
Loss of Valuable Agricultural land
Loss of Rural Character

The RLDP is therefore unsound with these proposals for this area and we urge the Inspector to re exam and reconsider these fully

Full text:

Q1: Policy CC4 Renewable, low and Zero Carbon Energy Generation and in context to Policy CC3 Renewable Energy Local Search Areas SOLAR Locations stated as East of Colwinston North of Llysworney North West of Llysworney

Industrialisation of The Countryside Impact on Visual Amenities Impact on Food Security Impact on Colwinston and Llysworney Landscape and infrastructure Visual impact. Impact on sites of importance for nature conservation being Ty Draw South of Colwinston Policy SP20 SINC id 147 Impact of Site Special Landscape area (2) Upper and Lower Thaw Valley policies DNP1 (2) No DNO apparatus or Supply No National Grid connection or availability Impact on Landscape with additional poles, pylons and electrical facilities along with associated roads, fencing, security and monitoring units. Removal and withdrawn use of BMV Agricultural land under ALC predictive map Wales grades. Loss of Valuable Agricultural land Loss of Rural Character

The RLDP in therefore unsound with these proposals for this area and We Urge The inspector to re exam and re consider these fully

Q2: Ticked no

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/swm

5173 Comment

Document Element: CC3 - Renewable Energy Local Search Areas

Respondent: Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]

Summary:

Solar and wind search areas (where appropriate) below the 10MW Developments of National Significance (DNS) have been identified (Policy CC3). The plan also includes a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW (Policy CC4). Policy CC3 makes reference to adhering to the criteria in Policy CC4. However, would it not be the case that if search areas have been identified in Policy CC3 have they not already met the criteria? If they would not, should they be identified in the first place? Clarity would be beneficial. The Welsh Government supports the approach but seeks clarity on the point raised.
The Welsh Government notes the proposed search areas for wind energy near Morfa Ystrad Owen/Nant Rhydhalog, according to the Peatlands of Wales Evidence Score Map, the search area includes areas of peatland (Evidence Score 4). The site is also a SINC. This raises concerns as to how the inclusion of this search areas meets the policy test in PPW 6.4.15, 1a and 1b (Stepwise) regarding avoidance of irreplaceable peatland habitats and PPW 6.4.34.

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities

and businesses and provide a robust basis for decision making.
Without prejudice to the Minster's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.
National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.
After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:
Annex 1 – General Conformity with Future Wales
• No significant concerns
Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)
• Spatial Strategy and Primary Settlements
• Housing and Economic Growth Levels – Regional Collaboration
• Maximising Affordable Housing Provision
• Delivery & Implementation – General
• Gypsy and Travellers
• Renewable Energy
• Minerals
• Best and Most Versatile Agricultural Land (BMV)
• Welsh Language

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.
My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.
Yours sincerely,
Neil Hemington
Chief Planner Welsh Government

Annex 1 - Statement of General Conformity
The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).
There is a joint position statement on the relationship between Bridgend, Cardiff and the Vale of Glamorgan (BP20A), which considers population growth, migration patterns, housing completions, employment characteristics, demographics, commuting and transport links between the three adjoining authorities. The Welsh Government supports the principle of this work which demonstrates how change in the Vale of Glamorgan relates and complements growth in adjoining local authorities. This approach illustrates a good mechanism for other local authorities to follow.
Reasons
Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the climate change and biodiversity emergencies, making the best use of resources.
Policy 1 and Policy 33 of Future Wales states that Cardiff, Newport, and the Valleys will be the main focus for growth and investment in the region. The strategic diagram (p163) also identifies the Vale of Glamorgan within the National Growth Area. The Vale of Glamorgan RLDP, specifically BP20A, provides robust evidence on the interrelationship and key issues with adjoining authorities, including their interaction and how they have shaped and influenced the scale/location of growth in the RLDP. This is set out in the three Joint Position Statements (JPSs).
BP45 'Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR), May 2024, provides further evidence on how the scale of growth indicated for the region has shaped the scale of future economic growth within the Vale of Glamorgan. This results in a higher level of employment growth in the Vale of Glamorgan primarily to increase self-containment and reduce out-flows to adjoining urban areas. Two key areas for future economic growth are identified at Cardiff Airport/Bro Tathan Enterprise Zone and Aberthaw Power Station.

The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.
On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):
Policy 1: Where will Wales grow
Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 6: Town Centre First
Policy 10: International Connectivity – Cardiff Airport
Policy 12 Regional Connectivity
Policy 33: National Growth Area – Cardiff, Newport and the Valleys
Policy 36: South-East Metro
Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.
With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.
The Level of Growth - Homes and Jobs
The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).
Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.
BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.
Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the

plan.
The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level of growth proposed in the plan.
We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.
The Welsh Government notes that BP0A identifies small and large windfalls, based on historic trends of 53/yr and 80/yr respectively. Also, the large windfalls are not included in the first two years of the trajectory, as per the DPM. A non-delivery allowance of 5% is identified, which reflects local characteristics in the Vale of Glamorgan. A flexibility allowance of 9.8% has been factored into the provision. The Welsh Government supports this approach, although whilst Appendix 1 contains a housing trajectory, there is no table to mirror that of Table 21, DPM. This should be included in Appendix 1. 6

Jobs: The Council's 10-year dwelling-led growth option results in a requirement for 4,875 new jobs (325 p/a) over the plan period. This broadly aligns with the projected growth for 5,338 (355 p/a) new jobs in the Employment Land Review (BP12) and as set out in Policy SP14.
The level of employment growth proposed (5,338 jobs) over the plan period is below the target in the currently adopted plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.
In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of homes and jobs proposed in the plan, which is in general conformity with Future Wales.
Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.
The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.
Paragraph 6.137 of the plan states:
"Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary."
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?

Affordable Housing Exceptions Sites

Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.

Employment Land

The Council's Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).

Delivery and Implementation

PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.

The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.

The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have 'rolled over' from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.

The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters.

It will be for the Council to justify deliverability supported by robust financial viability.

Gypsy and Travellers

The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are 'immediate' by 2026. WG note that 4 pitches have since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

Policy SP9 identifies a site at Llangan (0.76Ha) to accommodate the 7 pitches needed. It will be for the Council to demonstrate the appropriate site selection assessment process has been followed and that the site complies with requirements in PPW (4.2.35), Circular 005/2018 (paragraph 35) any relevant guidance and the DPM (5.80-5.85) to allocate a deliverable site in the plan period. The views of the relevant statutory bodies must also be agreed with no outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.

Renewable Energy

Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Could the Council provide an update on alternative options for a DHN in Barry?

It is welcome that the Renewable Energy Assessment (REA) has considered BMV policy, specifically for solar PV, and use of the Predictive ALC Map. The assessment has only considered non-BMV land (Subgrade 3b, Grade 4 and 5). The assessment would benefit from referencing the clarification provided in the DCPO letter of 1st March 2022 in respect of solar PV and BMV agricultural land for completeness.

The study identifies that in the Vale of Glamorgan solar development is more suitable than wind energy because of the flight path of aircraft in the south of the County Borough. However, there are some opportunities for wind sites, but these are likely to be small (<10MW) where aviation risks are lower and there is some grid access. Conversely, there are large expanses of land suitable for solar areas (>10MW) to the West of the County Borough, where there is little existing development. The study identifies 20 large-scale solar areas but recognises that grid constraints may impact the ability of sites to come forward.

Solar and wind search areas (where appropriate) below the 10MW Developments of National Significance (DNS) have been identified (Policy CC3). The plan also includes a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW (Policy CC4). Policy CC3 makes reference to adhering to the criteria in Policy CC4. However, would it not be the case that if search areas have been identified in Policy CC3 have they not already met the criteria? If they would not, should they be identified in the first place? Clarity would be beneficial. The Welsh Government supports the approach but seeks clarity on the point raised.

The Welsh Government notes the proposed search areas for wind energy near Morfa Ystrad Owen/Nant Rhydhalog, according to the Peatlands of Wales Evidence Score Map, the search area includes areas of peatland (Evidence Score 4). The site is also a SINC. This raises concerns as to how the inclusion of this search areas meets the policy test in PPW 6.4.15, 1a and 1b (Stepwise) regarding avoidance of irreplaceable peatland habitats and PPW 6.4.34.
Policy CC4 refers to Developments of National Significance (DNS) in 6.344 and 6.346. This should now refer to Strategic Infrastructure Projects (SIP) which replaced DNS.
Minerals
The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in the Vale of Glamorgan. The Welsh Government policy clarification letter (dated 11 November 2021) identifies a surplus of 1.68mt of crushed rock. As there is a surplus of crushed rock reserves and a lack of sand and gravel production in the Vale, no specific allocations are required in the replacement plan. It is unclear whether a Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region been agreed, or does the latest Position Statement (July 2022) explain how any shortfall will be met across 9

the region, particularly for crushed rock, of which the Vale has a surplus? Clarification would be beneficial.
BMV Agricultural Land
The Welsh Government has engaged with the Council for land quality advice, survey advice and ALC survey validation for candidate sites. The LPA has produced a specific topic paper on BMV policy application. BP23A. The Deposit RLDP allocates 188 hectares of housing land, 5.62 ha is identified as BMV land (under 3% of total housing allocations). The RLDP:
• Has sought to avoid BMV land wherever possible;
• Uses the Predictive ALC Map as a core evidence layer to inform: The spatial strategy;
• Settlement hierarchy decisions; and
• Candidate site assessments.
•
• Directs strategic growth to areas with least BMV land
• Removes or avoids allocations where BMV impacts were significant or unjustified.
• Quantifies total BMV loss and demonstrates it is minimal (5.62ha) and proportionate at plan level.
• Applies a sequential approach through: Preference for brownfield and non-BMV sites;
• Replacement of higher-BMV sites with lower-grade alternatives where possible.
•
• Requires site-specific ALC surveys to verify actual land quality before allocation.
• Demonstrates that allocated BMV land is: Often small, fragmented, or constrained;
• Sometimes previously disturbed or incapable of being farmed differently from surrounding lower-grade land; and
• Necessary to deliver the Plan's housing strategy where reasonable alternatives are unavailable.
•

In conclusion, the Welsh Government consider the Authority has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy, and on that basis no objection is offered.
Green Infrastructure
Policy SP19 should explicitly reference the need for development to be accompanied by a Green Infrastructure Statement.
PPW12 requires decision makers to apply the step wise approach to GI, with enhancement secured at every stage where possible, there is no distinction made between the quality of the GI assets – the qualification in the policy statement that states proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure should be redrafted to remove the quality reference. The need to avoid an impact in the first instance should also be explicitly incorporated into the policy.
Criterion 1 (Policy SP20) should be redrafted – the stepwise approach in PPW 12 6.4.15 1a - does not distinguish between relative ecological value – the avoidance step applies to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.
Welsh Language
There is limited reference to the Welsh language in the plan, either potential adverse impacts arising through development, or mechanisms via a policy framework to support and grow the use of the language. There are references to a number of Welsh-medium schools (3.26) and the increase in the number of people able to speak Welsh according to the 2011 census (3.52) but there is no mention of the authority's Welsh Language Strategy or promoting or cross-referencing to the aims of 10

Cymraeg 2050: A million Welsh-speakers. Paragraph 6.81 of the plan refers to development north west of Barry: "Land at North West Barry is allocated for a residential development of up to 376 dwellings and public open space. The site is in a sustainable location on the edge of the Barry, a key settlement, in a location that is well served by services and facilities, including a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium and Church in Wales) and two high schools (English and Welsh Medium) all located in reasonable walking distance. There is an active travel route along Port Road West, bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry. Barry station is 1.3 miles from the site entrance."
There is no mention that the Council want to undertake a Welsh Language Impact Assessment (WLIA) so there appears no attempt to measure the impact on the Welsh schools resulting from housing development? Could the Council clarify if such implications have already been covered in the WLIA for the plan, ISA, or are any specific policies necessary?

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/syf

6336 Comment

Document Element: CC3 - Renewable Energy Local Search Areas

Respondent: Richard Leach [3544]

Summary:

I note with interest that several fields to the north east of Llanmaes have been designated as potential solar farm sites. These very fields are partially responsible for the flooding risk in Llanmaes. I suspect that solar farms would not help this problem.

Full text:

I attended the consultation at CF61 about the RLDP and was advised to write to you with my comments.

I was pleased to see that in the RLDP that the fields adjacent to the LLantwit Major Bypass (site ID 436 Proposal number DN2(6) is designated as a Green wedge That application was made by our Community council and I fully support this proposal. the reasons they gave and I agree with this , are that protection of the open country side, protects against the coalescence of the town and our rural village, and protects the setting of the conservation area.

I see that the Planning policy has ring fenced the location of the proposed Lidl development (ID 379 Proposal number SP12(2) that is currently called in by the Welsh government . You will be aware that the Planning committee voted against the recommendation of the planning officer. when they made there decision, that is now being challenged as procedurally against a lot of Vale and Welsh Government policies. Looking forward to this site being included in the green wedge when this ridicules decision is over turned

I note with interest that several fields to the north east of Llanmaes have been designated as potential solar farm sites. These very fields are partially responsible for the flooding risk in Llanmaes. I suspect that solar farms would not help this problem.

The deferred flood alleviation scheme for Llanmaes affected our land in Siginstone lane. The RLDP mentions this scheme several times but no response has been forth coming. The village floods and for many many years The council and the Welsh government have put in funding in 2023, the Welsh government allocated £3,090,855 and in 24/25 £16,000 to solve this. Nothing has yet happened, indeed in the RLDP it is mentioned extensively that the village floods but we cannot see what specific directions have been made to resolve this problem. I urge the Vale council to liaise with the Welsh government about bringing this forward and mention in the deposit plan.
I appreciate that the costs of the plan increased substantially with the fuel costs of the Ukraine war and probable is increasing again. however parts of the plan , reprofiling the road and channeling flood water away from housing could have made a difference without the extensive earth works in fields referred too above. If my suggestion of extensive tree planting in above fields instead of bunds and channels had been implemented the risks may already be reduced.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/thx

6621 Comment

Document Element: CC3 - Renewable Energy Local Search Areas

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

Consultation should take place with the Designing out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.
We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local

Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.
Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.
Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.

The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where "qualifying activities" take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states 'The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.'
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.

Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery. Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)
identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.
South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:

• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:

• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that

meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in

principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

6649 Comment

Document Element: CC3 - Renewable Energy Local Search Areas

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as 'search areas'). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of "areas of high ecological value" will also go some way towards resolving the points we raise.
Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site

specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.
Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.
This will ensure that development in the area:
• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of 'High Ecological Value' (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We

have made comments regarding the term “high ecological value” in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan’s alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure
Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological
connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as 'search areas'). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to '6 broad habitat types' including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to '6 broad ecosystems' to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP's Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which

identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also

appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it “is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary”.
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW’s Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.

Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational
Pressure' within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs
clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

6702 Comment

Document Element: CC3 - Renewable Energy Local Search Areas

Respondent: Ministry of Defence (Mr Chris Waldron, DIO Assistant Safeguarding Manager) [690]

Summary:

The MOD needs to be consulted on all proposals to develop wind turbines that are 11m or greater in height to blade tip or, that have a rotor diameter of 2m or greater. This is necessary to safeguard defence radar coverage across the UK used to manage MOD ranges, provide air traffic control and maintain UK air defence.

The MOD notes that Draft Policy CC3 assigns the renewable energy local search areas that have been defined in the deposit plan. This supports the generation of non-domestic renewable, low and zero carbon energy. The Renewable Energy assessment from 2023 identifies potential opportunity areas for renewable energy and provides a high-level assessment of wind and solar energy resource within the Vale of Glamorgan and identifies several sites, known as 'search areas' where the potential for development is greatest, and identification of 20 of the largest sites for both wind and solar.

In principle, the MOD has no objection to any renewable energy development occurring in the renewable energy local search areas that have been defined, subject to confirming that that it will be compatible with defence safeguarding requirements.

Full text:

It is understood that Vale of Glamorgan Council are undertaking a Deposit Plan consultation regarding their proposed replacement Local Development Plan 2021 - 2036. This consultation details the overall Strategy, development policies, areas to be protected, and specific land allocations for development (including new housing, employment) over the 15-year period

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

The Welsh Government's Development Management Manual as revised May 2025, identifies, at figure 7, that a number of non-site-specific directions are currently in force, the list includes the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002. Through this direction the MOD is involved in the planning system as a statutory consultee. Statutory consultation occurs as a result of the provisions of the Direction, and the plans issued to Local Planning Authorities by the Welsh Government, which are provided by MOD.

The area covered by any Vale of Glamorgan Council Local Plan is partially covered by a safeguarding zone that is designated to maintain the effective operation of a MOD technical site that is retained at St Athan, at which is located a High-Resolution Direction Finder (HRDF) technical asset. This is a navigational aid which serves to maintain air traffic safety.

To illustrate the various issues that might be fundamental to MOD safeguarding assessments, a brief summary of the technical safeguarding zone is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

The dimensions and materials used in the construction of a development may be relevant factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to introduce large expanses of metal or electrical noise interference, which may be a particular issue where solar farms are developed.

The MOD notes and welcomes the intentions of Policy EMP2: MOD ST ATHAN. However, it is recommended that additional wording is added to make clear that this policy relates to the safeguarded MOD technical site. Therefore, it is recommended that wording is updated. "New development within or adjoining MOD St Athan and the safeguarded MOD technical site that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. Proposals for non-military or non-defence related development within or in the areas around MOD St Athan, or the safeguarded MOD technical site will not be supported where it would adversely affect military operations or capability, unless it can be demonstrated that there is no longer a defence or military need for the site."

Where development falls outside designated safeguarding zones the MOD may have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to:

Tall or narrow profile structures such as masts or flue stacks with a height of 50m or greater above ground level may introduce obstruction hazards to low flying military aircraft using the UK military low flying system.

The MOD also needs to be consulted on all proposals to develop wind turbines that are 11m or greater in height to blade tip or, that have a rotor diameter of 2m or greater. This is necessary to safeguard defence radar coverage across the UK used to manage MOD ranges, provide air traffic control and maintain UK air defence.

The MOD notes that Draft Policy CC3 assigns the renewable energy local search areas that have been defined in the deposit plan. This supports the generation of non-domestic renewable, low and zero carbon energy. The Renewable Energy assessment from 2023 identifies potential opportunity areas for renewable energy and provides a high-level assessment of wind and solar energy resource within the Vale of Glamorgan and identifies several sites, known as 'search areas' where the potential for development is greatest, and identification of 20 of the largest sites for both wind and solar.

Draft policy CC4 defines requirements that any development will need to demonstrate compatibility with. It is noted that specific reference to aviation safeguarding is included. However, the MOD considers it necessary that this is expanded to include specific reference to those technical assets which facilitate aviation safety such as navigational aids. In addition, the MOD also considers it necessary that specific mention of the need to account for defence radar coverage in relation to wind energy development is specifically identified.

In principle, the MOD has no objection to any renewable energy development occurring in the renewable energy local search areas that have been defined, subject to confirming that that it will be compatible with defence safeguarding requirements.
Some renewable energy generation infrastructure, for example wind turbine generators can, by virtue of their physical dimensions and properties, impact upon the effective operation of safeguarded defence technical installations. Solar farm developments located in proximity to safeguarded navigational aids, or other types of technical sites, can impact upon their effective operation by introducing substantial areas of metallic types of surfaces that may affect transmissions.
Where turbines are erected in line of sight to defence radars, the rotating motion of their blades can degrade and cause interference to their effective operation.
The MOD recommend that any emerging policy makes clear that, where an MOD assessment indicates that a development would have a detrimental impact on the operation and capability of defence assets or sites, that such an application would be refused or that conditions may be attached to any consent that might be issued which may include the removal of permitted development rights.
For your convenience, please find a table at Appendix A which provides a summary of the safeguarding criteria that would apply to those potential development housing allocations identified. MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. The table below provides a summary of those sites and the triggers for statutory safeguarding consultation that would apply:
I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.
Appendix A
Policy HG1 KS4 - MOD St Athan (technical safeguarding zone)
• Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement
• Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement
Policy HG1 KS5 - MOD St Athan (technical safeguarding zone)
• Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement
• Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement
Policy HG1(7) - MOD St Athan (technical safeguarding zone)
• Any development or change of use will trigger statutory consultation requirement
• Development of, or exceeding, 10.7m in height above ground level will trigger statutory consultation requirement
Policy HG1(8) - MOD St Athan (technical safeguarding zone)
• Any development or change of use will trigger statutory consultation requirement

Change suggested by respondent:

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Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/36v

7232 Support

Document Element: CC3 - Renewable Energy Local Search Areas

Respondent: Penarth Town Council (Mr Pete Newton, Principal Policy, Innovation and Development Officer) [1125]

Summary:

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Full text:

Penarth Town Council Deposit RLDP Consultation Response

Comments collated at a meeting of the Council's Consultation Task and Finish Group on 9th February 2026

Some Members attended the RLDP consultation drop-in session in Penarth and in general found it to be very informative.

Members support the general development strategy but did note the lack of information concerning discussions with adjacent and other nearby Principal Councils in the CJC Region. In view of the forthcoming Strategic Development Plan, encompassing the ten authorities, members felt that some further commentary regarding this is warranted.1

It is clear that the approach taken in the Cardiff paper is still that ideally, each Council is self-contained and "consumes its own smoke," which does not show any wider strategic thinking between the ten authorities in preparation for a regional Strategic Development Plan.

Members agreed with the view that infrastructure to support new housing developments was required in order to create successful developments, although they acknowledged that logistically it was difficult to pre-empt demand for some services such as travel and health services. Members also noted that predicting developmental needs and opportunities within wider context surrounding the UK's economic, political, and social landscapes.

Members noted that there was not much focus on Penarth or identified potential future development for Penarth beyond that already underway at the location near to Cosmeston but welcomed flexibility in its approach. Members expected to be more closely involved in the decisions and planning of this, and other such developments, and provide opportunity for wider consultation where appropriate, such as pre-application consultations, as well as would expect to be included in consultations concerning sites adjacent to Llandough, Dinas Powys, and Sully given their impact upon the town.

Penarth as a town is currently developed to its boundaries, save for the development at Cosmeston. It is, therefore, more dependent than other Service Centres on windfalls of land or buildings which may arise during the currency of the Plan. In 2023, an extensive assessment of the potential of the town concluded the following:

"There is marginally less capacity in Penarth [and Llandough] than the projected figures. However, this does not mean that the projections are incorrect or unjustifiable. The reported figures have not included a significant amount of capacity on open space land, and the projected figures for conversion of existing buildings and intensifications will be surpassed if the extant consents that exist this early in the Plan period are implemented."

The degree of flexibility, however, is substantially depending on one large site. P009, Headland School, is identified as both a potentially disused building and as a site with a capacity of 111-120 units. This special school is full to capacity and used by many Council in both Wales and England.

Members did note the inclusion of Cogan Transport Interchange under section 6.196 but would have liked to see more information about its future developments as they see it as key to increasing public transport use to Barry and further to West Wales in general.

Members wished to advise that issues with both the bridge and the platforms at Cogan have been long term, with accessibility being central to these issues. Members felt that improvements to accessibility should be a priority at this site, with planting and landscaping considered secondary to this.

Members felt it was key to consider the additional stress on Penarth from increased anticipated demand of public transport needs and emphasised the need for this to be aptly considered by bus route providers as part of development work.

Members wanted to see a strategy that actively protects the town's heritage and culture whilst still being able to provide for current and future generations.

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16 and section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report2, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Under CC2, it was noted that the presumption against demolition3 in favour of retrofit and reuse may constrain maximum transition to net zero as, whilst there is grant aid available for public buildings and social housing, the retrofit monies available for private stock is limited.

Additional considerations will also need to be made as part of the Third Carbon Budget (2026-2030), Local Area Energy Plans and the climate change ISA theme.

Members also felt similar about the inclusion and consideration of sustainable development through the specific strategy outlined in section 5 of the document and felt this linked in well with ongoing Placemaking work and its strategic approach as detailed in SP4.

Members were pleased to see mention of the diversification of high streets, although noted that Penarth was above average in terms of occupancy. They hoped that the RLDP would be able to support the town centre and support other ways it could be improved, such as a fishmonger or identifying a site for a new Cemetery.

With Penarth classified as a Service Centre, they are identified as having a defined role. However, the decline of in-person retailing means that defining role is not that evident, and Members felt there is potentially a need to move away from the traditional retail role of Town Centres in favour of "repurposing, creating multifunctional, commercial, and service centres that meet the needs of the communities they serve" in line with Future Wales Town Centre First Policy. The term 'repurposing' suggests a stronger role for the public sector in enabling these new purposes, and Members felt that Placemaking Plans could be one potential framework for this.

Members felt that potential functional support that could be provided could include:
• The appointment of a Town Centre Manager
• Using supporting interventions such as an extension or reshaping of normal services such as Neighbourhood Services.
• Using existing or emerging new powers, such as compulsory purchases.

Members wished for the RLDP to facilitate the safeguarding of essential public services, including health, policing, fire and rescue in the town, which would help to develop the defining role of a Service Centre, and felt that specific reference to these would be beneficial.

Members supported the avoidance of coalescence with adjacent settlements through the reconfirmation of Green Wedges as it allows for relevant extensions to those settlements whilst allowing them to retain their identity.

Members noted that the Quiet Area provision under DNP6 only applies to Penarth and wished to know why this was the case.

Members advised that they welcomed further opportunity for consultation, particularly in relation to developments in the neighbouring Cardiff Bay area whilst acknowledging that this is not necessarily an RLDP concern.

Footnotes

1 There is an evidence paper concerning relations with Cardiff and a Statement of Common Ground with Bridgend. However, there is only a reference in the RLDP text to discussions with other regional Councils and not the paper itself. We would be grateful if you could provide the paper as it does impact on the soundness of this Plan.

2The UK Climate Change Committee's 'Progress Report: Reducing Emissions in Wales' highlighted the following aspects of import: Skills, Vehicle Charging Networks, Improving Recycling, Energy Plans, Decarbonising Public Buildings and Social Housing, and reducing Road transport Demand (Car-Kilometres).

3The UK Environmental Audit Committee (2022) noted that "the evidence we received consistently recommended that retrofit and reuse be prioritised over new build."

Change suggested by respondent:

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Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3d5

5174 Comment

Document Element: CC4 - Renewable, Low and Zero Carbon Energy Generation

Respondent: Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]

Summary:

Policy CC4 refers to Developments of National Significance (DNS) in 6.344 and 6.346. This should now refer to Strategic Infrastructure Projects (SIP) which replaced DNS.

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.
Without prejudice to the Minster's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.
National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.
After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:
Annex 1 – General Conformity with Future Wales
• No significant concerns
Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)
• Spatial Strategy and Primary Settlements
• Housing and Economic Growth Levels – Regional Collaboration
• Maximising Affordable Housing Provision
• Delivery & Implementation – General
• Gypsy and Travellers
• Renewable Energy
• Minerals
• Best and Most Versatile Agricultural Land (BMV)
• Welsh Language

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.
My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.
Yours sincerely,
Neil Hemington
Chief Planner Welsh Government

Annex 1 - Statement of General Conformity
The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).
There is a joint position statement on the relationship between Bridgend, Cardiff and the Vale of Glamorgan (BP20A), which considers population growth, migration patterns, housing completions, employment characteristics, demographics, commuting and transport links between the three adjoining authorities. The Welsh Government supports the principle of this work which demonstrates how change in the Vale of Glamorgan relates and complements growth in adjoining local authorities. This approach illustrates a good mechanism for other local authorities to follow.
Reasons
Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the

climate change and biodiversity emergencies, making the best use of resources.
Policy 1 and Policy 33 of Future Wales states that Cardiff, Newport, and the Valleys will be the main focus for growth and investment in the region. The strategic diagram (p163) also identifies the Vale of Glamorgan within the National Growth Area. The Vale of Glamorgan RLDP, specifically BP20A, provides robust evidence on the interrelationship and key issues with adjoining authorities, including their interaction and how they have shaped and influenced the scale/location of growth in the RLDP. This is set out in the three Joint Position Statements (JPSs).
BP45 'Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR), May 2024, provides further evidence on how the scale of growth indicated for the region has shaped the scale of future economic growth within the Vale of Glamorgan. This results in a higher level of employment growth in the Vale of Glamorgan primarily to increase self-containment and reduce out-flows to adjoining urban areas. Two key areas for future economic growth are identified at Cardiff Airport/Bro Tathan Enterprise Zone and Aberthaw Power Station.
The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.
On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):
Policy 1: Where will Wales grow
Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 6: Town Centre First
Policy 10: International Connectivity – Cardiff Airport
Policy 12 Regional Connectivity
Policy 33: National Growth Area – Cardiff, Newport and the Valleys
Policy 36: South-East Metro
Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.
With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.
The Level of Growth - Homes and Jobs
The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).
Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.

BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.
Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.
The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level of growth proposed in the plan.
We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.
The Welsh Government notes that BP0A identifies small and large windfalls, based on historic trends of 53/yr and 80/yr respectively. Also, the large windfalls are not included in the first two years of the trajectory, as per the DPM. A non-delivery allowance of 5% is identified, which reflects local characteristics in the Vale of Glamorgan. A flexibility allowance of 9.8% has been factored into the provision. The Welsh Government supports this approach, although whilst Appendix 1 contains a housing trajectory, there is no table to mirror that of Table 21, DPM. This should be included in Appendix 1. 6

Jobs: The Council's 10-year dwelling-led growth option results in a requirement for 4,875 new jobs (325 p/a) over the plan period. This broadly aligns with the projected growth for 5,338 (355 p/a) new jobs in the Employment Land Review (BP12) and as set out in Policy SP14.
The level of employment growth proposed (5,338 jobs) over the plan period is below the target in the currently adopted plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.
In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of homes and jobs proposed in the plan, which is in general conformity with Future Wales.
Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.
The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of

this approach is supported.
Paragraph 6.137 of the plan states:
“Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary.”
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?
Affordable Housing Exceptions Sites
Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.
Employment Land
The Council’s Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).
Delivery and Implementation
PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.
The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.
The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have ‘rolled over’ from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.
The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters.
It will be for the Council to justify deliverability supported by robust financial viability.
Gypsy and Travellers
The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are ‘immediate’ by 2026. WG note that 4 pitches have since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

Policy SP9 identifies a site at Llangan (0.76Ha) to accommodate the 7 pitches needed. It will be for the Council to demonstrate the appropriate site selection assessment process has been followed and that the site complies with requirements in PPW (4.2.35), Circular 005/2018 (paragraph 35) any relevant guidance and the DPM (5.80-5.85) to allocate a deliverable site in the plan period. The views of the relevant statutory bodies must also be agreed with no outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.
Renewable Energy
Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Could the Council provide an update on alternative options for a DHN in Barry?
It is welcome that the Renewable Energy Assessment (REA) has considered BMV policy, specifically for solar PV, and use of the Predictive ALC Map. The assessment has only considered non-BMV land (Subgrade 3b, Grade 4 and 5). The assessment would benefit from referencing the clarification provided in the DCPO letter of 1st March 2022 in respect of solar PV and BMV agricultural land for completeness.
The study identifies that in the Vale of Glamorgan solar development is more suitable than wind energy because of the

flight path of aircraft in the south of the County Borough. However, there are some opportunities for wind sites, but these are likely to be small (<10MW) where aviation risks are lower and there is some grid access. Conversely, there are large expanses of land suitable for solar areas (>10MW) to the West of the County Borough, where there is little existing development. The study identifies 20 large-scale solar areas but recognises that grid constraints may impact the ability of sites to come forward.
Solar and wind search areas (where appropriate) below the 10MW Developments of National Significance (DNS) have been identified (Policy CC3). The plan also includes a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW (Policy CC4). Policy CC3 makes reference to adhering to the criteria in Policy CC4. However, would it not be the case that if search areas have been identified in Policy CC3 have they not already met the criteria? If they would not, should they be identified in the first place? Clarity would be beneficial. The Welsh Government supports the approach but seeks clarity on the point raised.
The Welsh Government notes the proposed search areas for wind energy near Morfa Ystrad Owen/Nant Rhydhalog, according to the Peatlands of Wales Evidence Score Map, the search area includes areas of peatland (Evidence Score 4). The site is also a SINC. This raises concerns as to how the inclusion of this search areas meets the policy test in PPW 6.4.15, 1a and 1b (Stepwise) regarding avoidance of irreplaceable peatland habitats and PPW 6.4.34.
Policy CC4 refers to Developments of National Significance (DNS) in 6.344 and 6.346. This should now refer to Strategic Infrastructure Projects (SIP) which replaced DNS.
Minerals
The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in the Vale of Glamorgan. The Welsh Government policy clarification letter (dated 11 November 2021) identifies a surplus of 1.68mt of crushed rock. As there is a surplus of crushed rock reserves and a lack of sand and gravel production in the Vale, no specific allocations are required in the replacement plan. It is unclear whether a Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region been agreed, or does the latest Position Statement (July 2022) explain how any shortfall will be met across 9

the region, particularly for crushed rock, of which the Vale has a surplus? Clarification would be beneficial.
BMV Agricultural Land
The Welsh Government has engaged with the Council for land quality advice, survey advice and ALC survey validation for candidate sites. The LPA has produced a specific topic paper on BMV policy application. BP23A. The Deposit RLDP allocates 188 hectares of housing land, 5.62 ha is identified as BMV land (under 3% of total housing allocations). The RLDP:
• Has sought to avoid BMV land wherever possible;
• Uses the Predictive ALC Map as a core evidence layer to inform: The spatial strategy;
• Settlement hierarchy decisions; and
• Candidate site assessments.
•
• Directs strategic growth to areas with least BMV land
• Removes or avoids allocations where BMV impacts were significant or unjustified.
• Quantifies total BMV loss and demonstrates it is minimal (5.62ha) and proportionate at plan level.
• Applies a sequential approach through: Preference for brownfield and non-BMV sites;
• Replacement of higher-BMV sites with lower-grade alternatives where possible.
•
• Requires site-specific ALC surveys to verify actual land quality before allocation.
• Demonstrates that allocated BMV land is: Often small, fragmented, or constrained;
• Sometimes previously disturbed or incapable of being farmed differently from surrounding lower-grade land; and
• Necessary to deliver the Plan's housing strategy where reasonable alternatives are unavailable.
•

In conclusion, the Welsh Government consider the Authority has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy, and on that basis no objection is offered.
Green Infrastructure
Policy SP19 should explicitly reference the need for development to be accompanied by a Green Infrastructure Statement.
PPW12 requires decision makers to apply the step wise approach to GI, with enhancement secured at every stage where possible, there is no distinction made between the quality of the GI assets – the qualification in the policy statement that states proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure should be redrafted to remove the quality reference. The need to avoid an impact in the first instance should also be explicitly incorporated into the policy.
Criterion 1 (Policy SP20) should be redrafted – the stepwise approach in PPW 12 6.4.15 1a - does not distinguish between relative ecological value – the avoidance step applies to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.
Welsh Language
There is limited reference to the Welsh language in the plan, either potential adverse impacts arising through development, or mechanisms via a policy framework to support and grow the use of the language. There are references to a number of Welsh-medium schools (3.26) and the increase in the number of people able to speak Welsh according to the 2011 census (3.52) but there is no mention of the authority's Welsh Language Strategy or promoting or cross-referencing to the aims of 10

Cymraeg 2050: A million Welsh-speakers. Paragraph 6.81 of the plan refers to development north west of Barry:
"Land at North West Barry is allocated for a residential development of up to 376 dwellings and public open space. The site is in a sustainable location on the edge of the Barry, a key settlement, in a location that is well served by services and facilities, including a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium and Church in Wales) and two high schools (English and Welsh Medium) all located in reasonable walking distance. There is an active travel route along Port Road West, bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry. Barry station is 1.3 miles from the site entrance."
There is no mention that the Council want to undertake a Welsh Language Impact Assessment (WLIA) so there appears no attempt to measure the impact on the Welsh schools resulting from housing development? Could the Council clarify if such implications have already been covered in the WLIA for the plan, ISA, or are any specific policies necessary?

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/syf

5716 Object

Document Element: CC4 - Renewable, Low and Zero Carbon Energy Generation

Respondent: Mr David Entwistle [3264]

Summary:

This policy is good in the main but greater weighting should be given to visual aspects as well. Many of the new solar farms within the vale are too visible from major roads and are negatively impacting on the visual aesthetics of the area. residents and visitors well being is negatively affected when whilst travelling around they vale they feel as if they are living within a giant power generation scheme.

Full text:

This policy is good in the main but greater weighting should be given to visual aspects as well. Many of the new solar farms within the vale are too visible from major roads and are negatively impacting on the visual aesthetics of the area. residents and visitors well being is negatively affected when whilst travelling around they vale they feel as if they are living within a giant power generation scheme.

Change suggested by respondent:

The policy needs to consider visual aspects more greatly and developers of solar farms need to be held to higher standards in terms of vegetation to shield the sites from view. The sites should also be more carefully considered and be required to use topographical relief to shield the sites from public view to a greater extent.

Sound: No

Attachments: None

6679 Comment

Document Element: CC4 - Renewable, Low and Zero Carbon Energy Generation

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.
We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.

Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.
Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design

can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: “Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime.”
The Terrorism (protection of premises)Act 2025 (Martyn’s Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where “qualifying activities” take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: “Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach” (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states ‘The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.’
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council’s standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal

gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery. Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)
identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.
South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of

multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.

3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and

Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.

• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

6703 Comment

Document Element: CC4 - Renewable, Low and Zero Carbon Energy Generation

Respondent: Ministry of Defence (Mr Chris Waldron, DIO Assistant Safeguarding Manager) [690]

Summary:

Draft policy CC4 defines requirements that any development will need to demonstrate compatibility with. It is noted that specific reference to aviation safeguarding is included. However, the MOD considers it necessary that this is expanded to include specific reference to those technical assets which facilitate aviation safety such as navigational aids. In addition, the MOD also considers it necessary that specific mention of the need to account for defence radar coverage in relation to wind energy development is specifically identified.

Some renewable energy generation infrastructure, for example wind turbine generators can, by virtue of their physical dimensions and properties, impact upon the effective operation of safeguarded defence technical installations. Solar farm developments located in proximity to safeguarded navigational aids, or other types of technical sites, can impact upon their effective operation by introducing substantial areas of metallic types of surfaces that may affect transmissions.

Where turbines are erected in line of sight to defence radars, the rotating motion of their blades can degrade and cause interference to their effective operation.

Full text:

It is understood that Vale of Glamorgan Council are undertaking a Deposit Plan consultation regarding their proposed replacement Local Development Plan 2021 - 2036. This consultation details the overall Strategy, development policies, areas to be protected, and specific land allocations for development (including new housing, employment) over the 15-year period

The Defence Infrastructure Organisation (DIO) Safeguarding Team represents the MOD as a statutory consultee in the UK planning system to ensure designated zones around key operational defence sites such as aerodromes, explosives storage sites, air weapon ranges, and technical sites are not adversely affected by development outside the MOD estate. For clarity, this response relates to MOD Safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other MOD sites or departments.

The Welsh Government's Development Management Manual as revised May 2025, identifies, at figure 7, that a number of non-site-specific directions are currently in force, the list includes the Town and Country Planning (Safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2002. Through this direction the MOD is involved in the planning system as a statutory consultee. Statutory consultation occurs as a result of the provisions of the Direction, and the plans issued to Local Planning Authorities by the Welsh Government, which are provided by MOD.

The area covered by any Vale of Glamorgan Council Local Plan is partially covered by a safeguarding zone that is designated to maintain the effective operation of a MOD technical site that is retained at St Athan, at which is located a High-Resolution Direction Finder (HRDF) technical asset. This is a navigational aid which serves to maintain air traffic safety.

To illustrate the various issues that might be fundamental to MOD safeguarding assessments, a brief summary of the technical safeguarding zone is provided below. Depending on the statutory safeguarding zone within which a site allocation or proposed development falls, different considerations will apply.

The dimensions and materials used in the construction of a development may be relevant factors in assessing the impact of a given scheme. Developments that incorporate renewable energy systems may be of particular concern given their potential to introduce large expanses of metal or electrical noise interference, which may be a particular issue where solar farms are developed.

The MOD notes and welcomes the intentions of Policy EMP2: MOD ST ATHAN. However, it is recommended that additional wording is added to make clear that this policy relates to the safeguarded MOD technical site. Therefore, it is recommended that wording is updated. "New development within or adjoining MOD St Athan and the safeguarded MOD technical site that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. Proposals for non-military or non-defence related development within or in the areas around MOD St Athan, or the safeguarded MOD technical site will not be supported where it would adversely affect military operations or capability, unless it can be demonstrated that there is no longer a defence or military need for the site."

Where development falls outside designated safeguarding zones the MOD may have an interest where development is of a type likely to have any impact on operational capability. Usually this will be by virtue of the scale, height, or other physical property of a development. Examples these types of development include, but are not limited to:

Tall or narrow profile structures such as masts or flue stacks with a height of 50m or greater above ground level may introduce obstruction hazards to low flying military aircraft using the UK military low flying system.

The MOD also needs to be consulted on all proposals to develop wind turbines that are 11m or greater in height to blade tip or, that have a rotor diameter of 2m or greater. This is necessary to safeguard defence radar coverage across the UK used to manage MOD ranges, provide air traffic control and maintain UK air defence.

The MOD notes that Draft Policy CC3 assigns the renewable energy local search areas that have been defined in the deposit plan. This supports the generation of non-domestic renewable, low and zero carbon energy. The Renewable Energy assessment from 2023 identifies potential opportunity areas for renewable energy and provides a high-level assessment of wind and solar energy resource within the Vale of Glamorgan and identifies several sites, known as 'search areas' where the potential for development is greatest, and identification of 20 of the largest sites for both wind and solar.

Draft policy CC4 defines requirements that any development will need to demonstrate compatibility with. It is noted that specific reference to aviation safeguarding is included. However, the MOD considers it necessary that this is expanded to include specific reference to those technical assets which facilitate aviation safety such as navigational aids. In addition, the MOD also considers it necessary that specific mention of the need to account for defence radar coverage in relation to wind energy development is specifically identified.

In principle, the MOD has no objection to any renewable energy development occurring in the renewable energy local search areas that have been defined, subject to confirming that that it will be compatible with defence safeguarding requirements.
Some renewable energy generation infrastructure, for example wind turbine generators can, by virtue of their physical dimensions and properties, impact upon the effective operation of safeguarded defence technical installations. Solar farm developments located in proximity to safeguarded navigational aids, or other types of technical sites, can impact upon their effective operation by introducing substantial areas of metallic types of surfaces that may affect transmissions.
Where turbines are erected in line of sight to defence radars, the rotating motion of their blades can degrade and cause interference to their effective operation.
The MOD recommend that any emerging policy makes clear that, where an MOD assessment indicates that a development would have a detrimental impact on the operation and capability of defence assets or sites, that such an application would be refused or that conditions may be attached to any consent that might be issued which may include the removal of permitted development rights.
For your convenience, please find a table at Appendix A which provides a summary of the safeguarding criteria that would apply to those potential development housing allocations identified. MOD recommend that any more detailed policies for these sites include wording which indicates that development should be designed to ensure that it would have no impact on the operation or capability of defence sites or assets. The table below provides a summary of those sites and the triggers for statutory safeguarding consultation that would apply:
I trust this clearly explains our position on this update. Please do not hesitate to contact me should you wish to consider these points further.
Appendix A
Policy HG1 KS4 - MOD St Athan (technical safeguarding zone)
• Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement
• Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement
Policy HG1 KS5 - MOD St Athan (technical safeguarding zone)
• Development of, or exceeding, 15.2m in height above ground level will trigger statutory consultation requirement
• Development of, or exceeding, 45.7m in height above ground level will trigger statutory consultation requirement
Policy HG1(7) - MOD St Athan (technical safeguarding zone)
• Any development or change of use will trigger statutory consultation requirement
• Development of, or exceeding, 10.7m in height above ground level will trigger statutory consultation requirement
Policy HG1(8) - MOD St Athan (technical safeguarding zone)
• Any development or change of use will trigger statutory consultation requirement

Change suggested by respondent:

The MOD recommend that any emerging policy makes clear that, where an MOD assessment indicates that a development would have a detrimental impact on the operation and capability of defence assets or sites, that such an application would be refused or that conditions may be attached to any consent that might be issued which may include the removal of permitted development rights.

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/36v

7233 Support

Document Element: CC4 - Renewable, Low and Zero Carbon Energy Generation

Respondent: Penarth Town Council (Mr Pete Newton, Principal Policy, Innovation and Development Officer) [1125]

Summary:

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Full text:

Penarth Town Council Deposit RLDP Consultation Response

Comments collated at a meeting of the Council's Consultation Task and Finish Group on 9th February 2026

Some Members attended the RLDP consultation drop-in session in Penarth and in general found it to be very informative.

Members support the general development strategy but did note the lack of information concerning discussions with adjacent and other nearby Principal Councils in the CJC Region. In view of the forthcoming Strategic Development Plan, encompassing the ten authorities, members felt that some further commentary regarding this is warranted.1

It is clear that the approach taken in the Cardiff paper is still that ideally, each Council is self-contained and "consumes its own smoke," which does not show any wider strategic thinking between the ten authorities in preparation for a regional Strategic Development Plan.

Members agreed with the view that infrastructure to support new housing developments was required in order to create successful developments, although they acknowledged that logistically it was difficult to pre-empt demand for some services such as travel and health services. Members also noted that predicting developmental needs and opportunities within wider context surrounding the UK's economic, political, and social landscapes.

Members noted that there was not much focus on Penarth or identified potential future development for Penarth beyond that already underway at the location near to Cosmeston but welcomed flexibility in its approach. Members expected to be more closely involved in the decisions and planning of this, and other such developments, and provide opportunity for wider consultation where appropriate, such as pre-application consultations, as well as would expect to be included in consultations concerning sites adjacent to Llandough, Dinas Powys, and Sully given their impact upon the town.

Penarth as a town is currently developed to its boundaries, save for the development at Cosmeston. It is, therefore, more dependent than other Service Centres on windfalls of land or buildings which may arise during the currency of the Plan. In 2023, an extensive assessment of the potential of the town concluded the following:

"There is marginally less capacity in Penarth [and Llandough] than the projected figures. However, this does not mean that the projections are incorrect or unjustifiable. The reported figures have not included a significant amount of capacity on open space land, and the projected figures for conversion of existing buildings and intensifications will be surpassed if the extant consents that exist this early in the Plan period are implemented."

The degree of flexibility, however, is substantially depending on one large site. P009, Headland School, is identified as both a potentially disused building and as a site with a capacity of 111-120 units. This special school is full to capacity and used by many Council in both Wales and England.

Members did note the inclusion of Cogan Transport Interchange under section 6.196 but would have liked to see more information about its future developments as they see it as key to increasing public transport use to Barry and further to West Wales in general.

Members wished to advise that issues with both the bridge and the platforms at Cogan have been long term, with accessibility being central to these issues. Members felt that improvements to accessibility should be a priority at this site, with planting and landscaping considered secondary to this.

Members felt it was key to consider the additional stress on Penarth from increased anticipated demand of public transport needs and emphasised the need for this to be aptly considered by bus route providers as part of development work.

Members wanted to see a strategy that actively protects the town's heritage and culture whilst still being able to provide for current and future generations.

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16 and section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report2, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Under CC2, it was noted that the presumption against demolition3 in favour of retrofit and reuse may constrain maximum transition to net zero as, whilst there is grant aid available for public buildings and social housing, the retrofit monies available for private stock is limited.

Additional considerations will also need to be made as part of the Third Carbon Budget (2026-2030), Local Area Energy Plans and the climate change ISA theme.

Members also felt similar about the inclusion and consideration of sustainable development through the specific strategy outlined in section 5 of the document and felt this linked in well with ongoing Placemaking work and its strategic approach as detailed in SP4.

Members were pleased to see mention of the diversification of high streets, although noted that Penarth was above average in terms of occupancy. They hoped that the RLDP would be able to support the town centre and support other ways it could be improved, such as a fishmonger or identifying a site for a new Cemetery.

With Penarth classified as a Service Centre, they are identified as having a defined role. However, the decline of in-person retailing means that defining role is not that evident, and Members felt there is potentially a need to move away from the traditional retail role of Town Centres in favour of "repurposing, creating multifunctional, commercial, and service centres

that meet the needs of the communities they serve" in line with Future Wales Town Centre First Policy. The term 'repurposing' suggests a stronger role for the public sector in enabling these new purposes, and Members felt that Placemaking Plans could be one potential framework for this.

Members felt that potential functional support that could be provided could include:
• The appointment of a Town Centre Manager
• Using supporting interventions such as an extension or reshaping of normal services such as Neighbourhood Services.
• Using existing or emerging new powers, such as compulsory purchases.

Members wished for the RLDP to facilitate the safeguarding of essential public services, including health, policing, fire and rescue in the town, which would help to develop the defining role of a Service Centre, and felt that specific reference to these would be beneficial.

Members supported the avoidance of coalescence with adjacent settlements through the reconfirmation of Green Wedges as it allows for relevant extensions to those settlements whilst allowing them to retain their identity.

Members noted that the Quiet Area provision under DNP6 only applies to Penarth and wished to know why this was the case.

Members advised that they welcomed further opportunity for consultation, particularly in relation to developments in the neighbouring Cardiff Bay area whilst acknowledging that this is not necessarily an RLDP concern.

Footnotes

1 There is an evidence paper concerning relations with Cardiff and a Statement of Common Ground with Bridgend. However, there is only a reference in the RLDP text to discussions with other regional Councils and not the paper itself. We would be grateful if you could provide the paper as it does impact on the soundness of this Plan.

2The UK Climate Change Committee's 'Progress Report: Reducing Emissions in Wales' highlighted the following aspects of import: Skills, Vehicle Charging Networks, Improving Recycling, Energy Plans, Decarbonising Public Buildings and Social Housing, and reducing Road transport Demand (Car-Kilometres).

3The UK Environmental Audit Committee (2022) noted that "the evidence we received consistently recommended that retrofit and reuse be prioritised over new build."

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3d5

5171 Comment

Document Element: CC5 - Promoting Heat Networks

Respondent: Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]

Summary:

Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Could the Council provide an update on alternative options for a DHN in Barry?

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.
Without prejudice to the Minster's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.
National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.
After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:
Annex 1 – General Conformity with Future Wales
• No significant concerns
Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)
• Spatial Strategy and Primary Settlements
• Housing and Economic Growth Levels – Regional Collaboration
• Maximising Affordable Housing Provision
• Delivery & Implementation – General
• Gypsy and Travellers
• Renewable Energy
• Minerals
• Best and Most Versatile Agricultural Land (BMV)
• Welsh Language

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.
My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.
Yours sincerely,
Neil Hemington
Chief Planner Welsh Government

Annex 1 - Statement of General Conformity
The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).
There is a joint position statement on the relationship between Bridgend, Cardiff and the Vale of Glamorgan (BP20A), which considers population growth, migration patterns, housing completions, employment characteristics, demographics, commuting and transport links between the three adjoining authorities. The Welsh Government supports the principle of this work which demonstrates how change in the Vale of Glamorgan relates and complements growth in adjoining local authorities. This approach illustrates a good mechanism for other local authorities to follow.
Reasons
Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider

regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the climate change and biodiversity emergencies, making the best use of resources.
Policy 1 and Policy 33 of Future Wales states that Cardiff, Newport, and the Valleys will be the main focus for growth and investment in the region. The strategic diagram (p163) also identifies the Vale of Glamorgan within the National Growth Area. The Vale of Glamorgan RLDP, specifically BP20A, provides robust evidence on the interrelationship and key issues with adjoining authorities, including their interaction and how they have shaped and influenced the scale/location of growth in the RLDP. This is set out in the three Joint Position Statements (JPSs).
BP45 'Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR), May 2024, provides further evidence on how the scale of growth indicated for the region has shaped the scale of future economic growth within the Vale of Glamorgan. This results in a higher level of employment growth in the Vale of Glamorgan primarily to increase self-containment and reduce out-flows to adjoining urban areas. Two key areas for future economic growth are identified at Cardiff Airport/Bro Tathan Enterprise Zone and Aberthaw Power Station.
The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.
On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):
Policy 1: Where will Wales grow
Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 6: Town Centre First
Policy 10: International Connectivity – Cardiff Airport
Policy 12 Regional Connectivity
Policy 33: National Growth Area – Cardiff, Newport and the Valleys
Policy 36: South-East Metro
Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.
With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.
The Level of Growth - Homes and Jobs
The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).
Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.
BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.
Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.
The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level of growth proposed in the plan.
We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.
The Welsh Government notes that BP0A identifies small and large windfalls, based on historic trends of 53/yr and 80/yr respectively. Also, the large windfalls are not included in the first two years of the trajectory, as per the DPM. A non-delivery allowance of 5% is identified, which reflects local characteristics in the Vale of Glamorgan. A flexibility allowance of 9.8% has been factored into the provision. The Welsh Government supports this approach, although whilst Appendix 1 contains a housing trajectory, there is no table to mirror that of Table 21, DPM. This should be included in Appendix 1. 6

Jobs: The Council's 10-year dwelling-led growth option results in a requirement for 4,875 new jobs (325 p/a) over the plan period. This broadly aligns with the projected growth for 5,338 (355 p/a) new jobs in the Employment Land Review (BP12) and as set out in Policy SP14.
The level of employment growth proposed (5,338 jobs) over the plan period is below the target in the currently adopted plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.
In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of homes and jobs proposed in the plan, which is in general conformity with Future Wales.
Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.
The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy

SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.
Paragraph 6.137 of the plan states:
"Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary."
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?
Affordable Housing Exceptions Sites
Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.
Employment Land
The Council's Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).
Delivery and Implementation
PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.
The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.
The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have 'rolled over' from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.
The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters.
It will be for the Council to justify deliverability supported by robust financial viability.
Gypsy and Travellers
The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are 'immediate' by 2026. WG note that 4 pitches have since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

Policy SP9 identifies a site at Llangan (0.76Ha) to accommodate the 7 pitches needed. It will be for the Council to demonstrate the appropriate site selection assessment process has been followed and that the site complies with requirements in PPW (4.2.35), Circular 005/2018 (paragraph 35) any relevant guidance and the DPM (5.80-5.85) to allocate a deliverable site in the plan period. The views of the relevant statutory bodies must also be agreed with no outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.
Renewable Energy
Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Could the Council provide an update on alternative options for a DHN in Barry?
It is welcome that the Renewable Energy Assessment (REA) has considered BMV policy, specifically for solar PV, and use of the Predictive ALC Map. The assessment has only considered non-BMV land (Subgrade 3b, Grade 4 and 5). The assessment would benefit from referencing the clarification provided in the DCPO letter of 1st March 2022 in respect of

solar PV and BMV agricultural land for completeness.
The study identifies that in the Vale of Glamorgan solar development is more suitable than wind energy because of the flight path of aircraft in the south of the County Borough. However, there are some opportunities for wind sites, but these are likely to be small (<10MW) where aviation risks are lower and there is some grid access. Conversely, there are large expanses of land suitable for solar areas (>10MW) to the West of the County Borough, where there is little existing development. The study identifies 20 large-scale solar areas but recognises that grid constraints may impact the ability of sites to come forward.
Solar and wind search areas (where appropriate) below the 10MW Developments of National Significance (DNS) have been identified (Policy CC3). The plan also includes a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW (Policy CC4). Policy CC3 makes reference to adhering to the criteria in Policy CC4. However, would it not be the case that if search areas have been identified in Policy CC3 have they not already met the criteria? If they would not, should they be identified in the first place? Clarity would be beneficial. The Welsh Government supports the approach but seeks clarity on the point raised.
The Welsh Government notes the proposed search areas for wind energy near Morfa Ystrad Owen/Nant Rhydhalog, according to the Peatlands of Wales Evidence Score Map, the search area includes areas of peatland (Evidence Score 4). The site is also a SINC. This raises concerns as to how the inclusion of this search areas meets the policy test in PPW 6.4.15, 1a and 1b (Stepwise) regarding avoidance of irreplaceable peatland habitats and PPW 6.4.34.
Policy CC4 refers to Developments of National Significance (DNS) in 6.344 and 6.346. This should now refer to Strategic Infrastructure Projects (SIP) which replaced DNS.
Minerals
The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in the Vale of Glamorgan. The Welsh Government policy clarification letter (dated 11 November 2021) identifies a surplus of 1.68mt of crushed rock. As there is a surplus of crushed rock reserves and a lack of sand and gravel production in the Vale, no specific allocations are required in the replacement plan. It is unclear whether a Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region been agreed, or does the latest Position Statement (July 2022) explain how any shortfall will be met across 9

the region, particularly for crushed rock, of which the Vale has a surplus? Clarification would be beneficial.
BMV Agricultural Land
The Welsh Government has engaged with the Council for land quality advice, survey advice and ALC survey validation for candidate sites. The LPA has produced a specific topic paper on BMV policy application. BP23A. The Deposit RLDP allocates 188 hectares of housing land, 5.62 ha is identified as BMV land (under 3% of total housing allocations). The RLDP:
• Has sought to avoid BMV land wherever possible;
• Uses the Predictive ALC Map as a core evidence layer to inform: The spatial strategy;
• Settlement hierarchy decisions; and
• Candidate site assessments.
•
• Directs strategic growth to areas with least BMV land
• Removes or avoids allocations where BMV impacts were significant or unjustified.
• Quantifies total BMV loss and demonstrates it is minimal (5.62ha) and proportionate at plan level.
• Applies a sequential approach through: Preference for brownfield and non-BMV sites;
• Replacement of higher-BMV sites with lower-grade alternatives where possible.
•
• Requires site-specific ALC surveys to verify actual land quality before allocation.
• Demonstrates that allocated BMV land is: Often small, fragmented, or constrained;
• Sometimes previously disturbed or incapable of being farmed differently from surrounding lower-grade land; and
• Necessary to deliver the Plan's housing strategy where reasonable alternatives are unavailable.
•

In conclusion, the Welsh Government consider the Authority has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy, and on that basis no objection is offered.
Green Infrastructure
Policy SP19 should explicitly reference the need for development to be accompanied by a Green Infrastructure Statement.
PPW12 requires decision makers to apply the step wise approach to GI, with enhancement secured at every stage where possible, there is no distinction made between the quality of the GI assets – the qualification in the policy statement that states proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure should be redrafted to remove the quality reference. The need to avoid an impact in the first instance should also be explicitly incorporated into the policy.
Criterion 1 (Policy SP20) should be redrafted – the stepwise approach in PPW 12 6.4.15 1a - does not distinguish between relative ecological value – the avoidance step applies to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.
Welsh Language
There is limited reference to the Welsh language in the plan, either potential adverse impacts arising through development, or mechanisms via a policy framework to support and grow the use of the language. There are references to a number of Welsh-medium schools (3.26) and the increase in the number of people able to speak Welsh according to the 2011 census (3.52) but there is no mention of the authority's Welsh Language Strategy or promoting or cross-

referencing to the aims of 10

Cymraeg 2050: A million Welsh-speakers. Paragraph 6.81 of the plan refers to development north west of Barry:
"Land at North West Barry is allocated for a residential development of up to 376 dwellings and public open space. The site is in a sustainable location on the edge of the Barry, a key settlement, in a location that is well served by services and facilities, including a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium and Church in Wales) and two high schools (English and Welsh Medium) all located in reasonable walking distance. There is an active travel route along Port Road West, bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry. Barry station is 1.3 miles from the site entrance."
There is no mention that the Council want to undertake a Welsh Language Impact Assessment (WLIA) so there appears no attempt to measure the impact on the Welsh schools resulting from housing development? Could the Council clarify if such implications have already been covered in the WLIA for the plan, ISA, or are any specific policies necessary?

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/syf

6620 Comment

Document Element: CC5 - Promoting Heat Networks

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

Advice should be sought from the Designing out Crime Officer to ensure the safe placement of heat pump devices.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.
We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.
Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.
Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local

authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where "qualifying activities" take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then

drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states 'The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.'
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery.

Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA) identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.
South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at: https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."

HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and

footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.

• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.

Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

7234 Support

Document Element: CC5 - Promoting Heat Networks

Respondent: Penarth Town Council (Mr Pete Newton, Principal Policy, Innovation and Development Officer) [1125]

Summary:

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Full text:

Penarth Town Council Deposit RLDP Consultation Response

Comments collated at a meeting of the Council's Consultation Task and Finish Group on 9th February 2026

Some Members attended the RLDP consultation drop-in session in Penarth and in general found it to be very informative.

Members support the general development strategy but did note the lack of information concerning discussions with adjacent and other nearby Principal Councils in the CJC Region. In view of the forthcoming Strategic Development Plan, encompassing the ten authorities, members felt that some further commentary regarding this is warranted.1

It is clear that the approach taken in the Cardiff paper is still that ideally, each Council is self-contained and "consumes its own smoke," which does not show any wider strategic thinking between the ten authorities in preparation for a regional Strategic Development Plan.

Members agreed with the view that infrastructure to support new housing developments was required in order to create successful developments, although they acknowledged that logistically it was difficult to pre-empt demand for some services such as travel and health services. Members also noted that predicting developmental needs and opportunities within wider context surrounding the UK's economic, political, and social landscapes.

Members noted that there was not much focus on Penarth or identified potential future development for Penarth beyond that already underway at the location near to Cosmeston but welcomed flexibility in its approach. Members expected to be more closely involved in the decisions and planning of this, and other such developments, and provide opportunity for wider consultation where appropriate, such as pre-application consultations, as well as would expect to be included in

consultations concerning sites adjacent to Llandough, Dinas Powys, and Sully given their impact upon the town.

Penarth as a town is currently developed to its boundaries, save for the development at Cosmeston. It is, therefore, more dependent than other Service Centres on windfalls of land or buildings which may arise during the currency of the Plan. In 2023, an extensive assessment of the potential of the town concluded the following:

“There is marginally less capacity in Penarth [and Llandough] than the projected figures. However, this does not mean that the projections are incorrect or unjustifiable. The reported figures have not included a significant amount of capacity on open space land, and the projected figures for conversion of existing buildings and intensifications will be surpassed if the extant consents that exist this early in the Plan period are implemented.”

The degree of flexibility, however, is substantially depending on one large site. P009, Headland School, is identified as both a potentially disused building and as a site with a capacity of 111-120 units. This special school is full to capacity and used by many Council in both Wales and England.

Members did note the inclusion of Cogan Transport Interchange under section 6.196 but would have liked to see more information about its future developments as they see it as key to increasing public transport use to Barry and further to West Wales in general.

Members wished to advise that issues with both the bridge and the platforms at Cogan have been long term, with accessibility being central to these issues. Members felt that improvements to accessibility should be a priority at this site, with planting and landscaping considered secondary to this.

Members felt it was key to consider the additional stress on Penarth from increased anticipated demand of public transport needs and emphasised the need for this to be aptly considered by bus route providers as part of development work.

Members wanted to see a strategy that actively protects the town’s heritage and culture whilst still being able to provide for current and future generations.

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16 and section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report2, Members were pleased to see that CC1-CC6 largely reflect the Committee’s finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Under CC2, it was noted that the presumption against demolition3 in favour of retrofit and reuse may constrain maximum transition to net zero as, whilst there is grant aid available for public buildings and social housing, the retrofit monies available for private stock is limited.

Additional considerations will also need to be made as part of the Third Carbon Budget (2026-2030), Local Area Energy Plans and the climate change ISA theme.

Members also felt similar about the inclusion and consideration of sustainable development through the specific strategy outlined in section 5 of the document and felt this linked in well with ongoing Placemaking work and its strategic approach as detailed in SP4.

Members were pleased to see mention of the diversification of high streets, although noted that Penarth was above average in terms of occupancy. They hoped that the RLDP would be able to support the town centre and support other ways it could be improved, such as a fishmonger or identifying a site for a new Cemetery.

With Penarth classified as a Service Centre, they are identified as having a defined role. However, the decline of in-person retailing means that defining role is not that evident, and Members felt there is potentially a need to move away from the traditional retail role of Town Centres in favour of “repurposing, creating multifunctional, commercial, and service centres that meet the needs of the communities they serve” in line with Future Wales Town Centre First Policy. The term ‘repurposing’ suggests a stronger role for the public sector in enabling these new purposes, and Members felt that Placemaking Plans could be one potential framework for this.

Members felt that potential functional support that could be provided could include:
• The appointment of a Town Centre Manager
• Using supporting interventions such as an extension or reshaping of normal services such as Neighbourhood Services.
• Using existing or emerging new powers, such as compulsory purchases.

Members wished for the RLDP to facilitate the safeguarding of essential public services, including health, policing, fire and rescue in the town, which would help to develop the defining role of a Service Centre, and felt that specific reference to these would be beneficial.

Members supported the avoidance of coalescence with adjacent settlements through the reconfirmation of Green Wedges as it allows for relevant extensions to those settlements whilst allowing them to retain their identity.

Members noted that the Quiet Area provision under DNP6 only applies to Penarth and wished to know why this was the case.

Members advised that they welcomed further opportunity for consultation, particularly in relation to developments in the neighbouring Cardiff Bay area whilst acknowledging that this is not necessarily an RLDP concern.

Footnotes

1 There is an evidence paper concerning relations with Cardiff and a Statement of Common Ground with Bridgend. However, there is only a reference in the RLDP text to discussions with other regional Councils and not the paper itself. We would be grateful if you could provide the paper as it does impact on the soundness of this Plan.

2The UK Climate Change Committee's 'Progress Report: Reducing Emissions in Wales' highlighted the following aspects of import: Skills, Vehicle Charging Networks, Improving Recycling, Energy Plans, Decarbonising Public Buildings and Social Housing, and reducing Road transport Demand (Car-Kilometres).

3The UK Environmental Audit Committee (2022) noted that "the evidence we received consistently recommended that retrofit and reuse be prioritised over new build."

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3d5

7235 Support

Document Element: CC6 - Coastal Defences and Shoreline Management

Respondent: Penarth Town Council (Mr Pete Newton, Principal Policy, Innovation and Development Officer) [1125]

Summary:

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Additional considerations will also need to be made as part of the Third Carbon Budget (2026-2030), Local Area Energy Plans and the climate change ISA theme.

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Members advised that they welcomed further opportunity for consultation, particularly in relation to developments in the neighbouring Cardiff Bay area whilst acknowledging that this is not necessarily an RLDP concern.

Footnotes

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3The UK Environmental Audit Committee (2022) noted that "the evidence we received consistently recommended that retrofit and reuse be prioritised over new build."

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3d5

5165 Comment

Document Element: SP17 - SUSTAINABLE WASTE MANAGEMENT

Respondent: Breedon Trading Limited (Mr Shaun Denny, Planner) [676]

Summary:

I support adding non-operational minerals sites for sustainable waste management but believe Wenvoe Quarry should be designated for handling residues from recycled Construction and Demolition Waste or imported non-recyclable materials like clays. This would replace the closed Whitehall site in the Vale, which is no longer operational, and I note that no similar facilities remain in the Cardiff area, with the nearest, Hendy Quarry, approaching closure.

Full text:

The Company supports the addition of non-operational minerals working sites to the list of sites where sustainable waste management facilities will be acceptable. It feels, however, that the policy should go further and identify Wenvoe Quarry as a suitable location for residues arising from the treatment of Construction and Demolition Waste (CDW) which has previously been subjected to recycling (according with national policy) or material not suitable for recycling such as clays would be imported. Such a facility would be a direct replacement for the closed Whitehall site in the Vale; indeed the Company believes there are no such facilities remaining in the greater Cardiff area and that the closest, Hendy Quarry in Rhondda Cynon Taf is close to closure.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6677 Comment

Document Element: SP17 - SUSTAINABLE WASTE MANAGEMENT

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.
We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.
Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.

Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where "qualifying activities" take

place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: “Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach” (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states ‘The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.’
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council’s standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the ‘Safer Parks’ document (research by ‘Make Space for Girls’) to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where “All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities.”

• Aim 1: More Homes, More Choice.
• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery. Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)
identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.
South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –

-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.

• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant

places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD

housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

6805 Support

Document Element: SP17 - SUSTAINABLE WASTE MANAGEMENT

Respondent: Mineral Products Association (Mr Peter Nicholas Horsley, Planning Director) [689]

Summary:

SP17 - Sustainable Waste Management:

Support - We note the proposals to facilitate sustainable waste management facilities on …. operational or non-operational mineral working sites and would support this.

Full text:

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and industrial sand industries. MPA is the sectoral voice for mineral products, covering 100% of UK cement and lime production, 90% of GB aggregates production, 95% of asphalt and over 60% of ready-mixed concrete and precast concrete production. In 2023, the industry supplied £18.4 billion worth of materials and services to the Economy, directly generating £6.7 billion in Gross Value Added (GVA). It is the largest supplier to the construction industry, which generated £141.5 billion in GVA in 2023. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting us on the above document. Mineral supply will be critical to delivering many of the objectives identified in the preferred strategy as well as many of the national infrastructure project proposed such as floating offshore wind in the Celtic Sea. We have major concerns over the reliance on outdated reserve information and the evidence base must reflect up to date reserve and sales statistics, together with projected demand for major developments.

It is disappointing that despite previous representations in 2022 & 2024, the points highlighted have not been addressed. We have therefore, reiterated our concerns below. We have also suggested alternative wording where appropriate.

We welcome further engagement on this matter to address the concerns.

2.50 Regional Technical Statement for Aggregates (2020) Second Review

We support the reference to the RTS (2nd Review), however, as the authority should be aware, WG has commission a further review (RTS3) which is expected to be published at the end of 2026/early 2027
Note the comment as this will be a material consideration as the plan progresses.

5.35 Barry Docks – ABP Masterplan.
Support - We note ABP's potential for rare earth processing at the Black Rocks Growth Zone and would support such a proposal.
No further comment

SP17 SUSTAINABLE WASTE MANAGEMENT
Support - We note the proposals to facilitate sustainable waste management facilities on …. operational or non-operational mineral working sites and would support this.
No further comment

SP18 Sustainable Provision of Minerals
The local and regional need for the provision of a continuous supply of minerals will be achieved through:
1 Maintaining a minimum of 10 years land bank of crushed rock throughout the plan period.
2 Favouring proposals which promote the sustainable use of minerals and encourage the use of secondary and alternative resources.
3 The safeguarding of known resources of sandstone, limestone, sand and gravel (where these occur outside settlements), from permanent development that would unnecessarily sterilise them or hinder their future extraction; and
4 Safeguarding railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate.
Object - Whilst we can support various elements in the proposed policy, we have concerns over the specific wording in it and the supporting text.
Most notably, subsection 2 does not accord with the PPW (5.11.4) in relation to the use of secondary and RECYCLED materials. It is not clear what is meant by "ALTERNATIVE RESOURCES". This should be replaced. Secondly, PPW "PROMOTES THE USE" and does not reference "favouring proposals. Accordingly, the wording should be amended to reflect PPW
Also, in relation to subsection 4, the proposed policy does not seek to apply safeguarding to minerals infrastructure as is required by PPW (5.14.7 & 5.24.8). Minerals infrastructure is more than just transportation hubs, it includes the wider processing facilities. Subsection 4 should therefore be amended.
The Policy should be amended to read -
"2 (~Favouring proposals which~) Promote the sustainable use of minerals and encourage the use of secondary and RECYCLED MATERIALS. (~alternative resources~)."
"4 Safeguarding EXISTING AND PLANNED INFRASTRUCTURE, INCLUDING railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, TOGETHER WITH WIDER MINERALS PROCESSING INFRASTRUCTURE.
6.373 This paragraph states "The 2nd Review of the Minerals Regional Technical Statement for the South Wales area, commonly referred to as RTS2, was published by the South Wales Regional Aggregates Working Party (SWRAWP) in September 2020. Appendix B of the RTS includes specific recommendations and guidance for each Local Planning Authority."
While this statement is factual, we suggest an additional sentence to reflect that Welsh Government has commission a further review of the Regional Technical Statement (RTS3) which has already commenced and is scheduled for completion by the end of 2026.
Add additional sentence to reflect RTS3.

6.374 This paragraph states
"In November 2021, the Welsh Government's Chief Planning Officer issued a Policy Clarification letter to rectify an arithmetical error within the RTS2. The clarification letter indicated that the apportionment for the Vale of Glamorgan is 17.05 million tonnes of crushed rock over 25 years. There is an existing landbank of 18.73 million tonnes of crushed rock (as of 31st December 2016), all of which relates to Carboniferous Limestone. There is no apportionment and no land bank for land-won sand and gravel."
We have significant concerns that the evidence base for the local plan has not been updated. Whilst RTS2 is undoubtedly material, the statement that "There is an existing landbank of 18.73 million tonnes of crushed rock" is not correct. As stated in the text, this is the landbank as of 31st December 2016. The Council must update its evidence base and provide a landbank figure which reflects the current permitted reserves.
Since the publication of the RTS2, there have been numerous publications to assist in updating the evidence base including the SWRAWP reports and AM2023.
In our responses to earlier iterations and consultations on the RLDP we highlighted the need for the Council to update the reserve figures. We also highlighted that planning submissions had indicated that circa 16.5mt of permitted reserve is suitable for non-aggregate use.
It is not clear if this tonnage is included in the 18.73mt referred too.
Greater clarity and analysis is required.

6.374 The wording also states "The report concludes that in view of the slight surplus of existing permitted crushed rock reserves and the lack of sand and gravel production in the Vale of Glamorgan, no further allocations are specifically required to be identified within the RLDP."

The “slight surplus” referred to was the position at 31st December 2016. The reserve figure needs to be updated.
Update the reserve figures to allow an accurate landbank tobe determined and the need for future allocations to be properly assessed. This should separate out projected aggregate and non-aggregate reserves to ensure clarity.

6.375 The wording states “The RTS2 requires Statements of Sub-regional Collaboration (SSRC) to be prepared by all constituent LPAs within each RTS sub-region. The Vale of Glamorgan along with Bridgend, Cardiff, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly and the Brecon Beacons National Park forms part of the Cardiff City subregion. The latest position statement for this sub-region (July 2022) indicates that while most authorities in the region, including the Vale of Glamorgan, can meet their apportionment for crushed rock, there is a shortfall of 7.475 million tonnes (Mt) within Cardiff that would require an additional RLDP allocation.”
Whilst the position statement referred to may suggest that the apportionment can be adequately met, as highlighted above, there are major concerns that the evidence base being relied upon is out of date. Further, Annex A of the RTS requires that “The LPAs involved should demonstrate, as far as possible, that the SSRC has been produced in consultation with relevant stakeholders, including the Regional Aggregate Working Party (RAWP), as part of the LDP process.” This has not been done and as such the SSRC process adopted is fundamentally flawed.
As clearly stated in our previous representations, there are major concerns over the evidence base and the process of relying upon an SSRC which has not followed the requisite protocol.

MIN1 Development in Minerals Safeguarding Areas
Whilst we support the principle of the policy, we suggest the addition of a further subsection addressing the scope for prior extraction. PPW (5.14.7) states “the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered.”
Add a further subsection to address the principle of prior extraction.

MIN2 Quarry Buffer Zones
This policy states “Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or
(~2 The proposal is located within an existing built-up area which already encroaches into the buffer zone.”~)
Object - Proposed subsection 2 is not an exception to the national buffer zone policy PPW (5.14.44) and should therefore be deleted.
Delete Subsection 2 “Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or”
2 The proposal is located within an existing built-up area which already encroaches into the buffer zone.”

MIN4 Sustainable Mineral Working.
This policy states
“Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will only be permitted where there is a proven national, regional or local need for the mineral and where:”
Object - This policy wording does not reflect PPW (5.11) which seeks to “promote” and not “prioritise” the use of recycled material and secondary aggregates.
Further the word “only” is superfluous and should be deleted.
Reword the policy
“Proposals which PROMOTE (~prioritise~) the use of recycled material and secondary aggregates AS AN ALTERNATIVE TO (~before new sources of~) primary materials (~are developed~) will be SUPPORTED (~favoured~) where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will (~only~) be permitted where there is a proven national, regional or local need for the mineral and where:”

6.388 The wording states “In view of the current landbank of reserves with planning permission at existing mineral working sites within the Vale of Glamorgan, there is no requirement for the Plan to allocate additional areas for limestone extraction.”
As stated above, the Evidence Base has not been updated to provide a true representation of the landbank. The permitted reserves being quoted date from 2016 and cannot provide a sound platform upon which mineral provision or requirements can be determined.
Update the evidence as required.

6.389 The wording states “Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured. The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore, the extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (MTAN1

Paragraph 34).” As stated above, the PPW seeks to promote the use of secondary and recycled aggregates. The council has not provided any evidence that secondary and recycled materials are not being maximised, or that primary materials are being used instead of secondary material. There is simply no evidence of “overprovision”. Further this is a misquote of MTAN1 Paragraph 34.
Amend the text accordingly.
Reword the text “Proposals which (~prioritise~) PROMOTE the use of recycled material and secondary aggregates (~before new sources of~) AS AN ALTERNATIVE TO primary materials (~are developed~) will be SUPPORTED (~favoured~). (~The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore~), The extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (~(MTAN1 Paragraph 34)~)

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Redacted Email Representation - https://valeofglamorgan.oc2.uk/a/3hn

5168 Comment

Document Element: WA1 - ASSESSMENT OF WASTE MANAGEMENT PROPOSALS

Respondent: Breedon Trading Limited (Mr Shaun Denny, Planner) [676]

Summary:

The Company believes a fifth category should be added, where an facility will result in a significant uplift in biodiversity that would be unlikely to be achieved by other means.

Full text:

The Company believes a fifth category should be added, where an facility will result in a significant uplift in biodiversity that would be unlikely to be achieved by other means.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

4631 Comment

Document Element: SP18 - SUSTAINABLE PROVISION OF MINERALS
Respondent: Mr David Barton [2683]

Summary:

Provide reserves for authentic TA such as quarry stone for raw materials to drive down costs effectively for better style construction in-keeping with the are rather than contemporary quickly dating globalist schematics that have arisen from generic CAD Models.

Full text:

Utilise Traditional Architecture Design Codes for all new construction with a ban on demolition of all buildings constructed prior to 1950. See my PDF Umbrella Representation for additional Placemaking/ Planning and Greenery Proposals.

Provide reserves for authentic TA such as quarry stone for raw materials to drive down costs effectively for better style construction in-keeping with the are rather than contemporary quickly dating globalist schematics that have arisen from generic CAD Models.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

6807 Object

Document Element: SP18 - SUSTAINABLE PROVISION OF MINERALS
Respondent: Mineral Products Association (Mr Peter Nicholas Horsley, Planning Director) [689]

Summary:

SP18 - Sustainable Provision of Minerals.

Object - Whilst we can support various elements in the proposed policy, we have concerns over the specific wording in it and the supporting text.

Most notably, subsection 2 does not accord with the PPW (5.11.4) in relation to the use of secondary and recycled materials. It is not clear what is meant by “alternative resources”. This should be replaced. Secondly, PPW “promotes the use” and does not reference “favouring proposals. Accordingly, the wording should be amended to reflect PPW

Also, in relation to subsection 4, the proposed policy does not seek to apply safeguarding to minerals infrastructure as is required by PPW (5.14.7 & 5.24.8). Minerals infrastructure is more than just transportation hubs, it includes the wider processing facilities. Subsection 4 should therefore be amended.

The Policy should be amended to read -

“2 (~Favouring proposals which~) Promote the sustainable use of minerals and encourage the use of secondary and RECYCLED MATERIALS. (~alternative resources~).”

“4 Safeguarding EXISTING AND PLANNED INFRASTRUCTURE, INCLUDING railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, TOGETHER WITH WIDER MINERALS PROCESSING INFRASTRUCTURE.

Full text:

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and industrial sand industries. MPA is the sectoral voice for mineral products, covering 100% of UK cement and lime production, 90% of GB aggregates production, 95% of asphalt and over 60% of ready-mixed concrete and precast concrete production. In 2023, the industry supplied £18.4 billion worth of materials and services to the Economy, directly generating £6.7 billion in Gross Value Added (GVA). It is the largest supplier to the construction industry, which generated £141.5 billion in GVA in 2023. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting us on the above document. Mineral supply will be critical to delivering many of the objectives identified in the preferred strategy as well as many of the national infrastructure project proposed such as floating offshore wind in the Celtic Sea. We have major concerns over the reliance on outdated reserve information and the evidence base must reflect up to date reserve and sales statistics, together with projected demand for major developments.

It is disappointing that despite previous representations in 2022 & 2024, the points highlighted have not been addressed. We have therefore, reiterated our concerns below. We have also suggested alternative wording where appropriate.

We welcome further engagement on this matter to address the concerns.

2.50 Regional Technical Statement for Aggregates (2020) Second Review
We support the reference to the RTS (2nd Review), however, as the authority should be aware, WG has commission a further review (RTS3) which is expected to be published at the end of 2026/early 2027
Note the comment as this will be a material consideration as the plan progresses.

5.35 Barry Docks – ABP Masterplan.
Support - We note ABP's potential for rare earth processing at the Black Rocks Growth Zone and would support such a proposal.
No further comment

SP17 SUSTAINABLE WASTE MANAGEMENT
Support - We note the proposals to facilitate sustainable waste management facilities on …. operational or non-operational mineral working sites and would support this.
No further comment

SP18 Sustainable Provision of Minerals
The local and regional need for the provision of a continuous supply of minerals will be achieved through:
1 Maintaining a minimum of 10 years land bank of crushed rock throughout the plan period.
2 Favouring proposals which promote the sustainable use of minerals and encourage the use of secondary and alternative resources.
3 The safeguarding of known resources of sandstone, limestone, sand and gravel (where these occur outside settlements), from permanent development that would unnecessarily sterilise them or hinder their future extraction; and
4 Safeguarding railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate.
Object - Whilst we can support various elements in the proposed policy, we have concerns over the specific wording in it and the supporting text.
Most notably, subsection 2 does not accord with the PPW (5.11.4) in relation to the use of secondary and RECYCLED materials. It is not clear what is meant by "ALTERNATIVE RESOURCES". This should be replaced. Secondly, PPW "PROMOTES THE USE" and does not reference "favouring proposals. Accordingly, the wording should be amended to reflect PPW
Also, in relation to subsection 4, the proposed policy does not seek to apply safeguarding to minerals infrastructure as is required by PPW (5.14.7 & 5.24.8). Minerals infrastructure is more than just transportation hubs, it includes the wider processing facilities. Subsection 4 should therefore be amended.
The Policy should be amended to read -
"2 (~Favouring proposals which~) Promote the sustainable use of minerals and encourage the use of secondary and RECYCLED MATERIALS. (~alternative resources~)."
"4 Safeguarding EXISTING AND PLANNED INFRASTRUCTURE, INCLUDING railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, TOGETHER WITH WIDER MINERALS PROCESSING INFRASTRUCTURE.
6.373 This paragraph states "The 2nd Review of the Minerals Regional Technical Statement for the South Wales area, commonly referred to as RTS2, was published by the South Wales Regional Aggregates Working Party (SWRAWP) in September 2020. Appendix B of the RTS includes specific recommendations and guidance for each Local Planning Authority."
While this statement is factual, we suggest an additional sentence to reflect that Welsh Government has commission a further review of the Regional Technical Statement (RTS3) which has already commenced and is scheduled for completion by the end of 2026.
Add additional sentence to reflect RTS3.

6.374 This paragraph states
"In November 2021, the Welsh Government's Chief Planning Officer issued a Policy Clarification letter to rectify an arithmetical error within the RTS2. The clarification letter indicated that the apportionment for the Vale of Glamorgan is 17.05 million tonnes of crushed rock over 25 years. There is an existing landbank of 18.73 million tonnes of crushed rock (as of 31st December 2016), all of which relates to Carboniferous Limestone. There is no apportionment and no land bank for land-won sand and gravel."
We have significant concerns that the evidence base for the local plan has not been updated. Whilst RTS2 is undoubtedly material, the statement that "There is an existing landbank of 18.73 million tonnes of crushed rock" is not correct. As stated in the text, this is the landbank as of 31st December 2016. The Council must update its evidence base and provide a landbank figure which reflects the current permitted reserves.
Since the publication of the RTS2, there have been numerous publications to assist in updating the evidence base including the SWRAWP reports and AM2023.
In our responses to earlier iterations and consultations on the RLDP we highlighted the need for the Council to update the reserve figures. We also highlighted that planning submissions had indicated that circa 16.5mt of permitted reserve is suitable for non-aggregate use.
It is not clear if this tonnage is included in the 18.73mt referred too.
Greater clarity and analysis is required.

6.374 The wording also states “The report concludes that in view of the slight surplus of existing permitted crushed rock reserves and the lack of sand and gravel production in the Vale of Glamorgan, no further allocations are specifically required to be identified within the RLDP.”
The “slight surplus” referred to was the position at 31st December 2016. The reserve figure needs to be updated.
Update the reserve figures to allow an accurate landbank tobe determined and the need for future allocations to be properly assessed. This should separate out projected aggregate and non-aggregate reserves to ensure clarity.

6.375 The wording states “The RTS2 requires Statements of Sub-regional Collaboration (SSRC) to be prepared by all constituent LPAs within each RTS sub-region. The Vale of Glamorgan along with Bridgend, Cardiff, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly and the Brecon Beacons National Park forms part of the Cardiff City subregion. The latest position statement for this sub-region (July 2022) indicates that while most authorities in the region, including the Vale of Glamorgan, can meet their apportionment for crushed rock, there is a shortfall of 7.475 million tonnes (Mt) within Cardiff that would require an additional RLDP allocation.”
Whilst the position statement referred to may suggest that the apportionment can be adequately met, as highlighted above, there are major concerns that the evidence base being relied upon is out of date. Further, Annex A of the RTS requires that “The LPAs involved should demonstrate, as far as possible, that the SSRC has been produced in consultation with relevant stakeholders, including the Regional Aggregate Working Party (RAWP), as part of the LDP process.” This has not been done and as such the SSRC process adopted is fundamentally flawed.
As clearly stated in our previous representations, there are major concerns over the evidence base and the process of relying upon an SSRC which has not followed the requisite protocol.

MIN1 Development in Minerals Safeguarding Areas
Whilst we support the principle of the policy, we suggest the addition of a further subsection addressing the scope for prior extraction. PPW (5.14.7) states “the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered.”
Add a further subsection to address the principle of prior extraction.

MIN2 Quarry Buffer Zones
This policy states “Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or
(~2 The proposal is located within an existing built-up area which already encroaches into the buffer zone.”~)
Object - Proposed subsection 2 is not an exception to the national buffer zone policy PPW (5.14.44) and should therefore be deleted.
Delete Subsection 2 “Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
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2 The proposal is located within an existing built-up area which already encroaches into the buffer zone.”

MIN4 Sustainable Mineral Working.
This policy states
“Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will only be permitted where there is a proven national, regional or local need for the mineral and where:”
Object - This policy wording does not reflect PPW (5.11) which seeks to “promote” and not “prioritise” the use of recycled material and secondary aggregates.
Further the word “only” is superfluous and should be deleted.
Reword the policy
“Proposals which PROMOTE (~prioritise~) the use of recycled material and secondary aggregates AS AN ALTERNATIVE TO (~before new sources of~) primary materials (~are developed~) will be SUPPORTED (~favoured~) where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will (~only~) be permitted where there is a proven national, regional or local need for the mineral and where:”

6.388 The wording states “In view of the current landbank of reserves with planning permission at existing mineral working sites within the Vale of Glamorgan, there is no requirement for the Plan to allocate additional areas for limestone extraction.”
As stated above, the Evidence Base has not been updated to provide a true representation of the landbank. The permitted reserves being quoted date from 2016 and cannot provide a sound platform upon which mineral provision or requirements can be determined.
Update the evidence as required.

6.389 The wording states “Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured. The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary

material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore, the extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (MTAN1 Paragraph 34).” As stated above, the PPW seeks to promote the use of secondary and recycled aggregates. The council has not provided any evidence that secondary and recycled materials are not being maximised, or that primary materials are being used instead of secondary material. There is simply no evidence of “overprovision”. Further this is a misquote of MTAN1 Paragraph 34.
Amend the text accordingly.
Reword the text “Proposals which (~prioritise~) PROMOTE the use of recycled material and secondary aggregates (~before new sources of~) AS AN ALTERNATIVE TO primary materials (~are developed~) will be SUPPORTED (~favoured~). (~The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore~), The extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (~(MTAN1 Paragraph 34)~)

Change suggested by respondent:

The Policy should be amended to read -

“2 (~Favouring proposals which~) Promote the sustainable use of minerals and encourage the use of secondary and RECYCLED MATERIALS. (~alternative resources~).”

“4 Safeguarding EXISTING AND PLANNED INFRASTRUCTURE, INCLUDING railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, TOGETHER WITH WIDER MINERALS PROCESSING INFRASTRUCTURE.

Sound: Not specified

Attachments:

Redacted Email Representation - https://valeofglamorgan.oc2.uk/a/3hn

6808 Comment

Document Element: SP18 - SUSTAINABLE PROVISION OF MINERALS

Respondent: Mineral Products Association (Mr Peter Nicholas Horsley, Planning Director) [689]

Summary:

Paragraph 6.373:

While this statement is factual, we suggest an additional sentence to reflect that Welsh Government has commission a further review of the Regional Technical Statement (RTS3) which has already commenced and is scheduled for completion by the end of 2026.

Add additional sentence to reflect RTS3.

Full text:

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and industrial sand industries. MPA is the sectoral voice for mineral products, covering 100% of UK cement and lime production, 90% of GB aggregates production, 95% of asphalt and over 60% of ready-mixed concrete and precast concrete production. In 2023, the industry supplied £18.4 billion worth of materials and services to the Economy, directly generating £6.7 billion in Gross Value Added (GVA). It is the largest supplier to the construction industry, which generated £141.5 billion in GVA in 2023. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting us on the above document. Mineral supply will be critical to delivering many of the objectives identified in the preferred strategy as well as many of the national infrastructure project proposed such as floating offshore wind in the Celtic Sea. We have major concerns over the reliance on outdated reserve information and the evidence base must reflect up to date reserve and sales statistics, together with projected demand for major developments.

It is disappointing that despite previous representations in 2022 & 2024, the points highlighted have not been addressed. We have therefore, reiterated our concerns below. We have also suggested alternative wording where appropriate.

We welcome further engagement on this matter to address the concerns.

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We support the reference to the RTS (2nd Review), however, as the authority should be aware, WG has commission a further review (RTS3) which is expected to be published at the end of 2026/early 2027

Note the comment as this will be a material consideration as the plan progresses.

5.35 Barry Docks – ABP Masterplan.
Support - We note ABP's potential for rare earth processing at the Black Rocks Growth Zone and would support such a proposal.
No further comment

SP17 SUSTAINABLE WASTE MANAGEMENT
Support - We note the proposals to facilitate sustainable waste management facilities on …. operational or non-operational mineral working sites and would support this.
No further comment

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3 The safeguarding of known resources of sandstone, limestone, sand and gravel (where these occur outside settlements), from permanent development that would unnecessarily sterilise them or hinder their future extraction; and
4 Safeguarding railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate.
Object - Whilst we can support various elements in the proposed policy, we have concerns over the specific wording in it and the supporting text.
Most notably, subsection 2 does not accord with the PPW (5.11.4) in relation to the use of secondary and RECYCLED materials. It is not clear what is meant by "ALTERNATIVE RESOURCES". This should be replaced. Secondly, PPW "PROMOTES THE USE" and does not reference "favouring proposals. Accordingly, the wording should be amended to reflect PPW
Also, in relation to subsection 4, the proposed policy does not seek to apply safeguarding to minerals infrastructure as is required by PPW (5.14.7 & 5.24.8). Minerals infrastructure is more than just transportation hubs, it includes the wider processing facilities. Subsection 4 should therefore be amended.
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The "slight surplus" referred to was the position at 31st December 2016. The reserve figure needs to be updated.
Update the reserve figures to allow an accurate landbank tobe determined and the need for future allocations to be

properly assessed. This should separate out projected aggregate and non-aggregate reserves to ensure clarity.

6.375 The wording states “The RTS2 requires Statements of Sub-regional Collaboration (SSRC) to be prepared by all constituent LPAs within each RTS sub-region. The Vale of Glamorgan along with Bridgend, Cardiff, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly and the Brecon Beacons National Park forms part of the Cardiff City subregion. The latest position statement for this sub-region (July 2022) indicates that while most authorities in the region, including the Vale of Glamorgan, can meet their apportionment for crushed rock, there is a shortfall of 7.475 million tonnes (Mt) within Cardiff that would require an additional RLDP allocation.”
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MIN1 Development in Minerals Safeguarding Areas
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This policy states “Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or
(~2 The proposal is located within an existing built-up area which already encroaches into the buffer zone.”~)
Object - Proposed subsection 2 is not an exception to the national buffer zone policy PPW (5.14.44) and should therefore be deleted.
Delete Subsection 2 “Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or”
2 The proposal is located within an existing built-up area which already encroaches into the buffer zone.”

MIN4 Sustainable Mineral Working.
This policy states
“Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will only be permitted where there is a proven national, regional or local need for the mineral and where:”
Object - This policy wording does not reflect PPW (5.11) which seeks to “promote” and not “prioritise” the use of recycled material and secondary aggregates.
Further the word “only” is superfluous and should be deleted.
Reword the policy
“Proposals which PROMOTE (~prioritise~) the use of recycled material and secondary aggregates AS AN ALTERNATIVE TO (~before new sources of~) primary materials (~are developed~) will be SUPPORTED (~favoured~) where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will (~only~) be permitted where there is a proven national, regional or local need for the mineral and where:”

6.388 The wording states “In view of the current landbank of reserves with planning permission at existing mineral working sites within the Vale of Glamorgan, there is no requirement for the Plan to allocate additional areas for limestone extraction.”
As stated above, the Evidence Base has not been updated to provide a true representation of the landbank. The permitted reserves being quoted date from 2016 and cannot provide a sound platform upon which mineral provision or requirements can be determined.
Update the evidence as required.

6.389 The wording states “Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured. The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore, the extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (MTAN1 Paragraph 34).” As stated above, the PPW seeks to promote the use of secondary and recycled aggregates. The council has not provided any evidence that secondary and recycled materials are not being maximised, or that primary materials

are being used instead of secondary material. There is simply no evidence of “overprovision”. Further this is a misquote of MTAN1 Paragraph 34.
Amend the text accordingly.
Reword the text “Proposals which (~prioritise~) PROMOTE the use of recycled material and secondary aggregates (~before new sources of~) AS AN ALTERNATIVE TO primary materials (~are developed~) will be SUPPORTED (~favoured~). (~The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore~), The extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (~(MTAN1 Paragraph 34)~)

Change suggested by respondent:

Add additional sentence to paragraph 6.373 to reflect RTS3.

Sound: Not specified

Attachments:

Redacted Email Representation - https://valeofglamorgan.oc2.uk/a/3hn

6809 Comment

Document Element: SP18 - SUSTAINABLE PROVISION OF MINERALS

Respondent: Mineral Products Association (Mr Peter Nicholas Horsley, Planning Director) [689]

Summary:

We have significant concerns that the evidence base for the local plan has not been updated. Whilst RTS2 is undoubtedly material, the statement that “There is an existing landbank of 18.73 million tonnes of crushed rock” is not correct. As stated in the text, this is the landbank as of 31st December 2016. The Council must update its evidence base and provide a landbank figure which reflects the current permitted reserves.

Since the publication of the RTS2, there have been numerous publications to assist in updating the evidence base including the SWRAWP reports and AM2023.

In our responses to earlier iterations and consultations on the RLDP we highlighted the need for the Council to update the reserve figures. We also highlighted that planning submissions had indicated that circa 16.5mt of permitted reserve is suitable for non-aggregate use.
It is not clear if this tonnage is included in the 18.73mt referred too.

Greater clarity and analysis is required.

Full text:

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and industrial sand industries. MPA is the sectoral voice for mineral products, covering 100% of UK cement and lime production, 90% of GB aggregates production, 95% of asphalt and over 60% of ready-mixed concrete and precast concrete production. In 2023, the industry supplied £18.4 billion worth of materials and services to the Economy, directly generating £6.7 billion in Gross Value Added (GVA). It is the largest supplier to the construction industry, which generated £141.5 billion in GVA in 2023. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting us on the above document. Mineral supply will be critical to delivering many of the objectives identified in the preferred strategy as well as many of the national infrastructure project proposed such as floating offshore wind in the Celtic Sea. We have major concerns over the reliance on outdated reserve information and the evidence base must reflect up to date reserve and sales statistics, together with projected demand for major developments.

It is disappointing that despite previous representations in 2022 & 2024, the points highlighted have not been addressed. We have therefore, reiterated our concerns below. We have also suggested alternative wording where appropriate.

We welcome further engagement on this matter to address the concerns.

2.50 Regional Technical Statement for Aggregates (2020) Second Review
We support the reference to the RTS (2nd Review), however, as the authority should be aware, WG has commission a further review (RTS3) which is expected to be published at the end of 2026/early 2027
Note the comment as this will be a material consideration as the plan progresses.

5.35 Barry Docks – ABP Masterplan.
Support - We note ABP’s potential for rare earth processing at the Black Rocks Growth Zone and would support such a proposal.
No further comment

SP17 SUSTAINABLE WASTE MANAGEMENT
Support - We note the proposals to facilitate sustainable waste management facilities on …. operational or non-operational mineral working sites and would support this.
No further comment

SP18 Sustainable Provision of Minerals
The local and regional need for the provision of a continuous supply of minerals will be achieved through:
1 Maintaining a minimum of 10 years land bank of crushed rock throughout the plan period.
2 Favouring proposals which promote the sustainable use of minerals and encourage the use of secondary and alternative resources.
3 The safeguarding of known resources of sandstone, limestone, sand and gravel (where these occur outside settlements), from permanent development that would unnecessarily sterilise them or hinder their future extraction; and
4 Safeguarding railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate.
Object - Whilst we can support various elements in the proposed policy, we have concerns over the specific wording in it and the supporting text.
Most notably, subsection 2 does not accord with the PPW (5.11.4) in relation to the use of secondary and RECYCLED materials. It is not clear what is meant by “ALTERNATIVE RESOURCES”. This should be replaced. Secondly, PPW “PROMOTES THE USE” and does not reference “favouring proposals. Accordingly, the wording should be amended to reflect PPW
Also, in relation to subsection 4, the proposed policy does not seek to apply safeguarding to minerals infrastructure as is required by PPW (5.14.7 & 5.24.8). Minerals infrastructure is more than just transportation hubs, it includes the wider processing facilities. Subsection 4 should therefore be amended.
The Policy should be amended to read -
“2 (~Favouring proposals which~) Promote the sustainable use of minerals and encourage the use of secondary and RECYCLED MATERIALS. (~alternative resources~).”
“4 Safeguarding EXISTING AND PLANNED INFRASTRUCTURE, INCLUDING railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, TOGETHER WITH WIDER MINERALS PROCESSING INFRASTRUCTURE.
6.373 This paragraph states “The 2nd Review of the Minerals Regional Technical Statement for the South Wales area, commonly referred to as RTS2, was published by the South Wales Regional Aggregates Working Party (SWRAWP) in September 2020. Appendix B of the RTS includes specific recommendations and guidance for each Local Planning Authority.”
While this statement is factual, we suggest an additional sentence to reflect that Welsh Government has commission a further review of the Regional Technical Statement (RTS3) which has already commenced and is scheduled for completion by the end of 2026.
Add additional sentence to reflect RTS3.

6.374 This paragraph states
“In November 2021, the Welsh Government’s Chief Planning Officer issued a Policy Clarification letter to rectify an arithmetical error within the RTS2. The clarification letter indicated that the apportionment for the Vale of Glamorgan is 17.05 million tonnes of crushed rock over 25 years. There is an existing landbank of 18.73 million tonnes of crushed rock (as of 31st December 2016), all of which relates to Carboniferous Limestone. There is no apportionment and no land bank for land-won sand and gravel.”
We have significant concerns that the evidence base for the local plan has not been updated. Whilst RTS2 is undoubtedly material, the statement that “There is an existing landbank of 18.73 million tonnes of crushed rock” is not correct. As stated in the text, this is the landbank as of 31st December 2016. The Council must update its evidence base and provide a landbank figure which reflects the current permitted reserves.
Since the publication of the RTS2, there have been numerous publications to assist in updating the evidence base including the SWRAWP reports and AM2023.
In our responses to earlier iterations and consultations on the RLDP we highlighted the need for the Council to update the reserve figures. We also highlighted that planning submissions had indicated that circa 16.5mt of permitted reserve is suitable for non-aggregate use.
It is not clear if this tonnage is included in the 18.73mt referred too.
Greater clarity and analysis is required.

6.374 The wording also states “The report concludes that in view of the slight surplus of existing permitted crushed rock reserves and the lack of sand and gravel production in the Vale of Glamorgan, no further allocations are specifically required to be identified within the RLDP.”
The “slight surplus” referred to was the position at 31st December 2016. The reserve figure needs to be updated.
Update the reserve figures to allow an accurate landbank tobe determined and the need for future allocations to be properly assessed. This should separate out projected aggregate and non-aggregate reserves to ensure clarity.

6.375 The wording states “The RTS2 requires Statements of Sub-regional Collaboration (SSRC) to be prepared by all constituent LPAs within each RTS sub-region. The Vale of Glamorgan along with Bridgend, Cardiff, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly and the Brecon Beacons National Park forms part of the Cardiff City subregion. The latest position statement for this sub-region (July 2022) indicates that while most authorities in the region, including the Vale

of Glamorgan, can meet their apportionment for crushed rock, there is a shortfall of 7.475 million tonnes (Mt) within Cardiff that would require an additional RLDP allocation."
Whilst the position statement referred to may suggest that the apportionment can be adequately met, as highlighted above, there are major concerns that the evidence base being relied upon is out of date. Further, Annex A of the RTS requires that "The LPAs involved should demonstrate, as far as possible, that the SSRC has been produced in consultation with relevant stakeholders, including the Regional Aggregate Working Party (RAWP), as part of the LDP process." This has not been done and as such the SSRC process adopted is fundamentally flawed.
As clearly stated in our previous representations, there are major concerns over the evidence base and the process of relying upon an SSRC which has not followed the requisite protocol.

MIN1 Development in Minerals Safeguarding Areas
Whilst we support the principle of the policy, we suggest the addition of a further subsection addressing the scope for prior extraction. PPW (5.14.7) states "the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered."
Add a further subsection to address the principle of prior extraction.

MIN2 Quarry Buffer Zones
This policy states "Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or
(~2 The proposal is located within an existing built-up area which already encroaches into the buffer zone."~)
Object - Proposed subsection 2 is not an exception to the national buffer zone policy PPW (5.14.44) and should therefore be deleted.
Delete Subsection 2 "Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or"
2 The proposal is located within an existing built-up area which already encroaches into the buffer zone."

MIN4 Sustainable Mineral Working.
This policy states
"Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will only be permitted where there is a proven national, regional or local need for the mineral and where:"
Object - This policy wording does not reflect PPW (5.11) which seeks to "promote" and not "prioritise" the use of recycled material and secondary aggregates.
Further the word "only" is superfluous and should be deleted.
Reword the policy
"Proposals which PROMOTE (~prioritise~) the use of recycled material and secondary aggregates AS AN ALTERNATIVE TO (~before new sources of~) primary materials (~are developed~) will be SUPPORTED (~favoured~) where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will (~only~) be permitted where there is a proven national, regional or local need for the mineral and where:"

6.388 The wording states "In view of the current landbank of reserves with planning permission at existing mineral working sites within the Vale of Glamorgan, there is no requirement for the Plan to allocate additional areas for limestone extraction."
As stated above, the Evidence Base has not been updated to provide a true representation of the landbank. The permitted reserves being quoted date from 2016 and cannot provide a sound platform upon which mineral provision or requirements can be determined.
Update the evidence as required.

6.389 The wording states "Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured. The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore, the extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (MTAN1 Paragraph 34)." As stated above, the PPW seeks to promote the use of secondary and recycled aggregates. The council has not provided any evidence that secondary and recycled materials are not being maximised, or that primary materials are being used instead of secondary material. There is simply no evidence of "overprovision". Further this is a misquote of MTAN1 Paragraph 34.
Amend the text accordingly.
Reword the text "Proposals which (~prioritise~) PROMOTE the use of recycled material and secondary aggregates (~before new sources of~) AS AN ALTERNATIVE TO primary materials (~are developed~) will be SUPPORTED (~favoured~). (~The Council recognises there is a need for a change in the pattern of supply of minerals from primary

sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore~), The extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (~(MTAN1 Paragraph 34)~)

Change suggested by respondent:

As stated in the text, this is the landbank as of 31st December 2016. The Council must update its evidence base and provide a landbank figure which reflects the current permitted reserves.

In our responses to earlier iterations and consultations on the RLDP we highlighted the need for the Council to update the reserve figures. We also highlighted that planning submissions had indicated that circa 16.5mt of permitted reserve is suitable for non-aggregate use.
It is not clear if this tonnage is included in the 18.73mt referred too.

Greater clarity and analysis is required.

Sound: Not specified

Attachments:

Redacted Email Representation - https://valeofglamorgan.oc2.uk/a/3hn

6810 Comment

Document Element: SP18 - SUSTAINABLE PROVISION OF MINERALS

Respondent: Mineral Products Association (Mr Peter Nicholas Horsley, Planning Director) [689]

Summary:

Paragraph 6.374:

The slight surplus referred to was the position at 31st December 2016. The reserve figure needs to be updated.

Update the reserve figures to allow an accurate landbank to be determined and the need for future allocations to be properly assessed. This should separate out projected aggregate and non-aggregate reserves to ensure clarity.

Full text:

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and industrial sand industries. MPA is the sectoral voice for mineral products, covering 100% of UK cement and lime production, 90% of GB aggregates production, 95% of asphalt and over 60% of ready-mixed concrete and precast concrete production. In 2023, the industry supplied £18.4 billion worth of materials and services to the Economy, directly generating £6.7 billion in Gross Value Added (GVA). It is the largest supplier to the construction industry, which generated £141.5 billion in GVA in 2023. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting us on the above document. Mineral supply will be critical to delivering many of the objectives identified in the preferred strategy as well as many of the national infrastructure project proposed such as floating offshore wind in the Celtic Sea. We have major concerns over the reliance on outdated reserve information and the evidence base must reflect up to date reserve and sales statistics, together with projected demand for major developments.

It is disappointing that despite previous representations in 2022 & 2024, the points highlighted have not been addressed. We have therefore, reiterated our concerns below. We have also suggested alternative wording where appropriate.

We welcome further engagement on this matter to address the concerns.

2.50 Regional Technical Statement for Aggregates (2020) Second Review
We support the reference to the RTS (2nd Review), however, as the authority should be aware, WG has commission a further review (RTS3) which is expected to be published at the end of 2026/early 2027
Note the comment as this will be a material consideration as the plan progresses.

5.35 Barry Docks – ABP Masterplan.
Support - We note ABP's potential for rare earth processing at the Black Rocks Growth Zone and would support such a proposal.
No further comment

SP17 SUSTAINABLE WASTE MANAGEMENT
Support - We note the proposals to facilitate sustainable waste management facilities on …. operational or non-operational mineral working sites and would support this.
No further comment

SP18 Sustainable Provision of Minerals
The local and regional need for the provision of a continuous supply of minerals will be achieved through:
1 Maintaining a minimum of 10 years land bank of crushed rock throughout the plan period.
2 Favouring proposals which promote the sustainable use of minerals and encourage the use of secondary and alternative resources.
3 The safeguarding of known resources of sandstone, limestone, sand and gravel (where these occur outside settlements), from permanent development that would unnecessarily sterilise them or hinder their future extraction; and
4 Safeguarding railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate.
Object - Whilst we can support various elements in the proposed policy, we have concerns over the specific wording in it and the supporting text.
Most notably, subsection 2 does not accord with the PPW (5.11.4) in relation to the use of secondary and RECYCLED materials. It is not clear what is meant by “ALTERNATIVE RESOURCES”. This should be replaced. Secondly, PPW “PROMOTES THE USE” and does not reference “favouring proposals. Accordingly, the wording should be amended to reflect PPW
Also, in relation to subsection 4, the proposed policy does not seek to apply safeguarding to minerals infrastructure as is required by PPW (5.14.7 & 5.24.8). Minerals infrastructure is more than just transportation hubs, it includes the wider processing facilities. Subsection 4 should therefore be amended.
The Policy should be amended to read -
“2 (~Favouring proposals which~) Promote the sustainable use of minerals and encourage the use of secondary and RECYCLED MATERIALS. (~alternative resources~).”
“4 Safeguarding EXISTING AND PLANNED INFRASTRUCTURE, INCLUDING railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, TOGETHER WITH WIDER MINERALS PROCESSING INFRASTRUCTURE.
6.373 This paragraph states “The 2nd Review of the Minerals Regional Technical Statement for the South Wales area, commonly referred to as RTS2, was published by the South Wales Regional Aggregates Working Party (SWRAWP) in September 2020. Appendix B of the RTS includes specific recommendations and guidance for each Local Planning Authority.”
While this statement is factual, we suggest an additional sentence to reflect that Welsh Government has commission a further review of the Regional Technical Statement (RTS3) which has already commenced and is scheduled for completion by the end of 2026.
Add additional sentence to reflect RTS3.

6.374 This paragraph states
“In November 2021, the Welsh Government’s Chief Planning Officer issued a Policy Clarification letter to rectify an arithmetical error within the RTS2. The clarification letter indicated that the apportionment for the Vale of Glamorgan is 17.05 million tonnes of crushed rock over 25 years. There is an existing landbank of 18.73 million tonnes of crushed rock (as of 31st December 2016), all of which relates to Carboniferous Limestone. There is no apportionment and no land bank for land-won sand and gravel.”
We have significant concerns that the evidence base for the local plan has not been updated. Whilst RTS2 is undoubtedly material, the statement that “There is an existing landbank of 18.73 million tonnes of crushed rock” is not correct. As stated in the text, this is the landbank as of 31st December 2016. The Council must update its evidence base and provide a landbank figure which reflects the current permitted reserves.
Since the publication of the RTS2, there have been numerous publications to assist in updating the evidence base including the SWRAWP reports and AM2023.
In our responses to earlier iterations and consultations on the RLDP we highlighted the need for the Council to update the reserve figures. We also highlighted that planning submissions had indicated that circa 16.5mt of permitted reserve is suitable for non-aggregate use.
It is not clear if this tonnage is included in the 18.73mt referred too.
Greater clarity and analysis is required.

6.374 The wording also states “The report concludes that in view of the slight surplus of existing permitted crushed rock reserves and the lack of sand and gravel production in the Vale of Glamorgan, no further allocations are specifically required to be identified within the RLDP.”
The “slight surplus” referred to was the position at 31st December 2016. The reserve figure needs to be updated.
Update the reserve figures to allow an accurate landbank tobe determined and the need for future allocations to be properly assessed. This should separate out projected aggregate and non-aggregate reserves to ensure clarity.

6.375 The wording states “The RTS2 requires Statements of Sub-regional Collaboration (SSRC) to be prepared by all constituent LPAs within each RTS sub-region. The Vale of Glamorgan along with Bridgend, Cardiff, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly and the Brecon Beacons National Park forms part of the Cardiff City subregion. The latest position statement for this sub-region (July 2022) indicates that while most authorities in the region, including the Vale of Glamorgan, can meet their apportionment for crushed rock, there is a shortfall of 7.475 million tonnes (Mt) within Cardiff that would require an additional RLDP allocation.”
Whilst the position statement referred to may suggest that the apportionment can be adequately met, as highlighted above, there are major concerns that the evidence base being relied upon is out of date. Further, Annex A of the RTS requires that “The LPAs involved should demonstrate, as far as possible, that the SSRC has been produced in consultation with relevant stakeholders, including the Regional Aggregate Working Party (RAWP), as part of the LDP

process." This has not been done and as such the SSRC process adopted is fundamentally flawed.
As clearly stated in our previous representations, there are major concerns over the evidence base and the process of relying upon an SSRC which has not followed the requisite protocol.

MIN1 Development in Minerals Safeguarding Areas
Whilst we support the principle of the policy, we suggest the addition of a further subsection addressing the scope for prior extraction. PPW (5.14.7) states "the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered."
Add a further subsection to address the principle of prior extraction.

MIN2 Quarry Buffer Zones
This policy states "Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or
(~2 The proposal is located within an existing built-up area which already encroaches into the buffer zone."~)
Object - Proposed subsection 2 is not an exception to the national buffer zone policy PPW (5.14.44) and should therefore be deleted.
Delete Subsection 2 "Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or"
2 The proposal is located within an existing built-up area which already encroaches into the buffer zone."

MIN4 Sustainable Mineral Working.
This policy states
"Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will only be permitted where there is a proven national, regional or local need for the mineral and where:"
Object - This policy wording does not reflect PPW (5.11) which seeks to "promote" and not "prioritise" the use of recycled material and secondary aggregates.
Further the word "only" is superfluous and should be deleted.
Reword the policy
"Proposals which PROMOTE (~prioritise~) the use of recycled material and secondary aggregates AS AN ALTERNATIVE TO (~before new sources of~) primary materials (~are developed~) will be SUPPORTED (~favoured~) where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will (~only~) be permitted where there is a proven national, regional or local need for the mineral and where:"

6.388 The wording states "In view of the current landbank of reserves with planning permission at existing mineral working sites within the Vale of Glamorgan, there is no requirement for the Plan to allocate additional areas for limestone extraction."
As stated above, the Evidence Base has not been updated to provide a true representation of the landbank. The permitted reserves being quoted date from 2016 and cannot provide a sound platform upon which mineral provision or requirements can be determined.
Update the evidence as required.

6.389 The wording states "Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured. The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore, the extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (MTAN1 Paragraph 34)." As stated above, the PPW seeks to promote the use of secondary and recycled aggregates. The council has not provided any evidence that secondary and recycled materials are not being maximised, or that primary materials are being used instead of secondary material. There is simply no evidence of "overprovision". Further this is a misquote of MTAN1 Paragraph 34.
Amend the text accordingly.
Reword the text "Proposals which (~prioritise~) PROMOTE the use of recycled material and secondary aggregates (~before new sources of~) AS AN ALTERNATIVE TO primary materials (~are developed~) will be SUPPORTED (~favoured~). (~The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore~), The extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (~(MTAN1 Paragraph 34)~)

Change suggested by respondent:

The slight surplus referred to was the position at 31st December 2016. The reserve figure needs to be updated.

Update the reserve figures to allow an accurate landbank to be determined and the need for future allocations to be properly assessed. This should separate out projected aggregate and non-aggregate reserves to ensure clarity.

Sound: Not specified

Attachments:

Redacted Email Representation - https://valeofglamorgan.oc2.uk/a/3hn

6811 Comment

Document Element: SP18 - SUSTAINABLE PROVISION OF MINERALS

Respondent: Mineral Products Association (Mr Peter Nicholas Horsley, Planning Director) [689]

Summary:

Paragraph 6.375:

Whilst the position statement referred to may suggest that the apportionment can be adequately met, as highlighted above, there are major concerns that the evidence base being relied upon is out of date. Further, Annex A of the RTS requires that "The LPAs involved should demonstrate, as far as possible, that the SSRC has been produced in consultation with relevant stakeholders, including the Regional Aggregate Working Party (RAWP), as part of the LDP process." This has not been done and as such the SSRC process adopted is fundamentally flawed.

As clearly stated in our previous representations, there are major concerns over the evidence base and the process of relying upon an SSRC which has not followed the requisite protocol.

Full text:

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and industrial sand industries. MPA is the sectoral voice for mineral products, covering 100% of UK cement and lime production, 90% of GB aggregates production, 95% of asphalt and over 60% of ready-mixed concrete and precast concrete production. In 2023, the industry supplied £18.4 billion worth of materials and services to the Economy, directly generating £6.7 billion in Gross Value Added (GVA). It is the largest supplier to the construction industry, which generated £141.5 billion in GVA in 2023. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting us on the above document. Mineral supply will be critical to delivering many of the objectives identified in the preferred strategy as well as many of the national infrastructure project proposed such as floating offshore wind in the Celtic Sea. We have major concerns over the reliance on outdated reserve information and the evidence base must reflect up to date reserve and sales statistics, together with projected demand for major developments.

It is disappointing that despite previous representations in 2022 & 2024, the points highlighted have not been addressed. We have therefore, reiterated our concerns below. We have also suggested alternative wording where appropriate.

We welcome further engagement on this matter to address the concerns.

2.50 Regional Technical Statement for Aggregates (2020) Second Review
We support the reference to the RTS (2nd Review), however, as the authority should be aware, WG has commission a further review (RTS3) which is expected to be published at the end of 2026/early 2027
Note the comment as this will be a material consideration as the plan progresses.

5.35 Barry Docks – ABP Masterplan.
Support - We note ABP's potential for rare earth processing at the Black Rocks Growth Zone and would support such a proposal.
No further comment

SP17 SUSTAINABLE WASTE MANAGEMENT
Support - We note the proposals to facilitate sustainable waste management facilities on …. operational or non-operational mineral working sites and would support this.
No further comment

SP18 Sustainable Provision of Minerals
The local and regional need for the provision of a continuous supply of minerals will be achieved through:
1 Maintaining a minimum of 10 years land bank of crushed rock throughout the plan period.
2 Favouring proposals which promote the sustainable use of minerals and encourage the use of secondary and alternative resources.
3 The safeguarding of known resources of sandstone, limestone, sand and gravel (where these occur outside settlements), from permanent development that would unnecessarily sterilise them or hinder their future extraction; and

4 Safeguarding railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate.
Object - Whilst we can support various elements in the proposed policy, we have concerns over the specific wording in it and the supporting text.
Most notably, subsection 2 does not accord with the PPW (5.11.4) in relation to the use of secondary and RECYCLED materials. It is not clear what is meant by “ALTERNATIVE RESOURCES”. This should be replaced. Secondly, PPW “PROMOTES THE USE” and does not reference “favouring proposals. Accordingly, the wording should be amended to reflect PPW
Also, in relation to subsection 4, the proposed policy does not seek to apply safeguarding to minerals infrastructure as is required by PPW (5.14.7 & 5.24.8). Minerals infrastructure is more than just transportation hubs, it includes the wider processing facilities. Subsection 4 should therefore be amended.
The Policy should be amended to read -
“2 (~Favouring proposals which~) Promote the sustainable use of minerals and encourage the use of secondary and RECYCLED MATERIALS. (~alternative resources~).”
“4 Safeguarding EXISTING AND PLANNED INFRASTRUCTURE, INCLUDING railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, TOGETHER WITH WIDER MINERALS PROCESSING INFRASTRUCTURE.
6.373 This paragraph states “The 2nd Review of the Minerals Regional Technical Statement for the South Wales area, commonly referred to as RTS2, was published by the South Wales Regional Aggregates Working Party (SWRAWP) in September 2020. Appendix B of the RTS includes specific recommendations and guidance for each Local Planning Authority.”
While this statement is factual, we suggest an additional sentence to reflect that Welsh Government has commission a further review of the Regional Technical Statement (RTS3) which has already commenced and is scheduled for completion by the end of 2026.
Add additional sentence to reflect RTS3.

6.374 This paragraph states
“In November 2021, the Welsh Government’s Chief Planning Officer issued a Policy Clarification letter to rectify an arithmetical error within the RTS2. The clarification letter indicated that the apportionment for the Vale of Glamorgan is 17.05 million tonnes of crushed rock over 25 years. There is an existing landbank of 18.73 million tonnes of crushed rock (as of 31st December 2016), all of which relates to Carboniferous Limestone. There is no apportionment and no land bank for land-won sand and gravel.”
We have significant concerns that the evidence base for the local plan has not been updated. Whilst RTS2 is undoubtedly material, the statement that “There is an existing landbank of 18.73 million tonnes of crushed rock” is not correct. As stated in the text, this is the landbank as of 31st December 2016. The Council must update its evidence base and provide a landbank figure which reflects the current permitted reserves.
Since the publication of the RTS2, there have been numerous publications to assist in updating the evidence base including the SWRAWP reports and AM2023.
In our responses to earlier iterations and consultations on the RLDP we highlighted the need for the Council to update the reserve figures. We also highlighted that planning submissions had indicated that circa 16.5mt of permitted reserve is suitable for non-aggregate use.
It is not clear if this tonnage is included in the 18.73mt referred too.
Greater clarity and analysis is required.

6.374 The wording also states “The report concludes that in view of the slight surplus of existing permitted crushed rock reserves and the lack of sand and gravel production in the Vale of Glamorgan, no further allocations are specifically required to be identified within the RLDP.”
The “slight surplus” referred to was the position at 31st December 2016. The reserve figure needs to be updated.
Update the reserve figures to allow an accurate landbank tobe determined and the need for future allocations to be properly assessed. This should separate out projected aggregate and non-aggregate reserves to ensure clarity.

6.375 The wording states “The RTS2 requires Statements of Sub-regional Collaboration (SSRC) to be prepared by all constituent LPAs within each RTS sub-region. The Vale of Glamorgan along with Bridgend, Cardiff, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly and the Brecon Beacons National Park forms part of the Cardiff City subregion. The latest position statement for this sub-region (July 2022) indicates that while most authorities in the region, including the Vale of Glamorgan, can meet their apportionment for crushed rock, there is a shortfall of 7.475 million tonnes (Mt) within Cardiff that would require an additional RLDP allocation.”
Whilst the position statement referred to may suggest that the apportionment can be adequately met, as highlighted above, there are major concerns that the evidence base being relied upon is out of date. Further, Annex A of the RTS requires that “The LPAs involved should demonstrate, as far as possible, that the SSRC has been produced in consultation with relevant stakeholders, including the Regional Aggregate Working Party (RAWP), as part of the LDP process.” This has not been done and as such the SSRC process adopted is fundamentally flawed.
As clearly stated in our previous representations, there are major concerns over the evidence base and the process of relying upon an SSRC which has not followed the requisite protocol.

MIN1 Development in Minerals Safeguarding Areas
Whilst we support the principle of the policy, we suggest the addition of a further subsection addressing the scope for prior extraction. PPW (5.14.7) states “the potential for extraction of mineral resources prior to undertaking other forms of

development, have been considered."
Add a further subsection to address the principle of prior extraction.

MIN2 Quarry Buffer Zones
This policy states "Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or
(~2 The proposal is located within an existing built-up area which already encroaches into the buffer zone."~)
Object - Proposed subsection 2 is not an exception to the national buffer zone policy PPW (5.14.44) and should therefore be deleted.
Delete Subsection 2 "Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or"
2 The proposal is located within an existing built-up area which already encroaches into the buffer zone."

MIN4 Sustainable Mineral Working.
This policy states
"Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will only be permitted where there is a proven national, regional or local need for the mineral and where:"
Object - This policy wording does not reflect PPW (5.11) which seeks to "promote" and not "prioritise" the use of recycled material and secondary aggregates.
Further the word "only" is superfluous and should be deleted.
Reword the policy
"Proposals which PROMOTE (~prioritise~) the use of recycled material and secondary aggregates AS AN ALTERNATIVE TO (~before new sources of~) primary materials (~are developed~) will be SUPPORTED (~favoured~) where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will (~only~) be permitted where there is a proven national, regional or local need for the mineral and where:"

6.388 The wording states "In view of the current landbank of reserves with planning permission at existing mineral working sites within the Vale of Glamorgan, there is no requirement for the Plan to allocate additional areas for limestone extraction."
As stated above, the Evidence Base has not been updated to provide a true representation of the landbank. The permitted reserves being quoted date from 2016 and cannot provide a sound platform upon which mineral provision or requirements can be determined.
Update the evidence as required.

6.389 The wording states "Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured. The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore, the extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (MTAN1 Paragraph 34)." As stated above, the PPW seeks to promote the use of secondary and recycled aggregates. The council has not provided any evidence that secondary and recycled materials are not being maximised, or that primary materials are being used instead of secondary material. There is simply no evidence of "overprovision". Further this is a misquote of MTAN1 Paragraph 34.
Amend the text accordingly.
Reword the text "Proposals which (~prioritise~) PROMOTE the use of recycled material and secondary aggregates (~before new sources of~) AS AN ALTERNATIVE TO primary materials (~are developed~) will be SUPPORTED (~favoured~). (~The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore~), The extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (~(MTAN1 Paragraph 34)~)

Change suggested by respondent:

There are major concerns over the evidence base and the process of relying upon an SSRC which has not followed the requisite protocol.

Sound: Not specified

Attachments:

Redacted Email Representation - https://valeofglamorgan.oc2.uk/a/3hn

7117 Support

Document Element: SP18 - SUSTAINABLE PROVISION OF MINERALS

Respondent: Seth Hill & Son Ltd [1197]
Agent: Highlight Planning

Summary:

Seth Hill & Son Ltd supports the general objective of maintaining an adequate minerals supply and managing mineral resources through a plan-led framework.

Full text:

REPRESENTATIONS TO THE DEPOSIT VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036 ON BEHALF OF SETH HILL AND SON LTD

1. Introduction

These representations are submitted on behalf of Seth Hill & Son Ltd in response to the Deposit Vale of Glamorgan Replacement Local Development Plan 2021–2036.

They relate specifically to the treatment of Pant-y-Ffynnon Quarry / Seth Hill Quarry, Bonvilston in the Deposit Plan and the associated candidate site assessment process.

The principal concern arises from the Council's candidate site assessment, which states that a positive allocation for mineral working is not included because "The 2nd Review of the Minerals Regional Technical Statement indicates no further allocations are specifically required to be identified within the Vale of Glamorgan RLDP."

That explanation addresses only the narrow issue of whether a fresh minerals allocation is presently required on RTS2 arithmetic. It does not adequately address the planning merits of Pant-y-Ffynnon Quarry itself, nor does it justify a limited or negative treatment of the site in the Deposit RLDP.

These representations therefore object to the overly narrow basis on which the site appears to have been discounted for positive recognition and seek a more balanced and evidence-based treatment of Pant-y-Ffynnon Quarry within the Plan.

2. Site context

Pant-y-Ffynnon Quarry is an established quarrying location with an existing mineral planning history and an established role within the local minerals framework.

The candidate site planning statement explains that the site comprises the full extent of the currently consented Ffynnon Quarry, together with adjoining land to the south. It confirms that the quarry extracts limestone and that the consented quarry element is identified in the adopted LDP as a Quarry Site, with adjoining land within the Buffer Zone and wider Mineral Safeguarding Area. The submission sought to retain the existing LDP status of the consented element and to safeguard the potential for further quarrying to take place on the remainder of the site in the longer term.

The candidate site statement also recorded the continuing active planning context at the site, including application ref. 2021/01379/FUL for the resumption of limestone extraction in the North Quarry, the establishment of an aggregates recycling facility, and restoration of the North Quarry using inert waste materials. That position has since been materially reinforced by the ROMP determination.

Decision notice 2024/00246/ENV is a Determination of New Working Conditions for Pantyffynnon Quarry / Seth Hill Quarry, Bonvilston. The decision provides that the new conditions replace those attached to permissions 97/01084/FUL and 2009/00184/ENV. Condition 1 states that "No operations authorised by this permission, with the exception of restoration and after-treatment works approved under these conditions shall take place after 21 February 2042." The decision also requires a detailed working scheme, revised working programmes every five years, and imposes an annual production limit of 250,000 tonnes.

BP25 independently corroborates the continuing active status of the quarry. It identifies Pantyffynnon in Table 1 as an active quarry with an extraction end date of 21.02.2042. BP25 also confirms that the Vale of Glamorgan is an "important supplier of Carboniferous limestone for general aggregate use".

Taken together, that evidence confirms that the site is not simply a historic quarry with uncertain prospects. It is an active quarry with a recently updated modern conditions framework and an extraction end date beyond the RLDP period.

3. Objection to the candidate site assessment

The Council's candidate site assessment relies on the proposition that no further allocations are specifically required because of the RTS2 position. That reasoning is too narrow.

The statement that no further allocations are specifically required may explain why the Council has concluded that it does not presently need to identify a fresh minerals allocation in order to meet the current quantitative apportionment. It does not, however, address the separate issue of how the Plan should treat an existing quarry site such as Pant-y-Ffynnon Quarry.

The absence of a current need for a new allocation is not the same as a conclusion that an established quarry site should cease to be positively recognised, should no longer be meaningfully safeguarded, or should be treated as strategically unimportant.

The candidate site submission itself demonstrates why the Council's reasoning is incomplete. The submission did not merely seek a fresh allocation on the basis of additional tonnage need. It sought retention of the existing quarry status of the consented element and safeguarding of the wider site for longer-term quarrying potential.

The ROMP decision strengthens that point considerably. A site that has recently been granted updated

mineral working conditions and is authorised to continue operations until 21 February 2042 cannot sensibly be treated as though its future role is immaterial simply because current RTS2 figures do not require a further allocation elsewhere in the Vale.

The Council's approach is also difficult to reconcile with national plan-making guidance. The Development Plans Manual states that plans should be based on "robust evidence" so they can be delivered, that candidate sites should not be purposefully excluded from assessment, and that the key objective is whether a promoter has a serious intention to bring the site forward, which links directly to the soundness question "Will the plan deliver?"

In those circumstances, the candidate site assessment appears to conflate two distinct questions: whether a new specific allocation is numerically required under RTS2, and whether an established quarry site should continue to be positively recognised and safeguarded in the Plan. Those questions are not the same. The former may currently be answered in the negative. The latter, in the case of Pant-y-Ffynnon Quarry, should plainly be answered in the affirmative.

4. National and local policy context

The wider policy and evidence framework supports a more positive treatment of Pant-y-Ffynnon Quarry than is reflected in the candidate site assessment.

PPW states that it is in the interests of the minerals industry that landbanks reflect "real possibilities for future mineral working" and adds that authorities should provide "a clear guide to where nonenergy mineral extraction is likely to be acceptable".

MTAN1 explains that development plans should identify "dormant reserves" separately and states that "A more realistic landbank assessment is the aim of this process" so that a more accurate picture emerges of reserves "that are likely to have real potential for future working". It also states that the future landbank should include land specifically allocated for the working of aggregates as an "extended landbank".

The SWRAWP RTS reinforces the point that reserve arithmetic is not the whole picture. It states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects, changes in planning policy, protected site designations or other permitting constraints. This is particularly relevant given the increasingly important role of NRW licensing and abstraction controls, including quarry dewatering considerations, which may mean that some reserves are no longer as readily available or economically viable as historic landbank figures imply. Accordingly, apparent reserve sufficiency in quantitative terms may overstate the extent of genuinely deliverable supply. SWRAWP also confirms that dormant reserves "must be counted separately".

The Deposit RLDP's own framework is consistent with that broader policy approach. The Plan safeguards known limestone resources and retains quarry buffer zones so that incompatible development does not prejudice mineral operations or future working. BP25 explains that the RLDP safeguards finite mineral resources for future generations and protects them from permanent development that could sterilise or hinder extraction.

The Plan also provides a detailed framework for sustainable mineral working, including new workings, extensions and the reworking or reopening of old workings. That mechanism is intended to deal with the detailed merits of mineral proposals, including environmental effects, amenity, hydrology, transport and restoration. There is therefore no sound policy basis for adopting an unduly negative position toward Pant-y-Ffynnon Quarry at plan-making stage simply because no fresh allocation is currently required.

5. Benefits of continued extraction at Pant-y-Ffynnon Quarry

Continued extraction at Pant-y-Ffynnon Quarry would give rise to a number of important site-specific and strategic benefits.

PPW expressly recognises the planning advantages of extending established quarry sites. Paragraph 5.14.48 states that "The presence of an existing quarry should be a material consideration when considering a proposal for an extension. There may be benefits to extending a site in terms of shared infrastructure, for instance, as opposed to working a new greenfield site." That principle is directly relevant to Pant-y-Ffynnon Quarry. The site is an existing quarrying location with an established operational and planning context, and any continued working or extension would be able to build upon that existing quarrying footprint, associated infrastructure and minerals land use relationship. In planning terms, that is materially preferable to directing future working to an entirely new greenfield location, and it reinforces the case for the Deposit RLDP to continue to recognise the site positively within the minerals strategy rather than treating it as strategically unimportant simply because no fresh allocation is currently required.

The site is an existing quarrying location with an established mineral planning history. Continued extraction would therefore amount to the continuation and proper management of an existing quarrying use rather than the introduction of mineral development into a wholly new location. That is a material land use consideration.

The candidate site statement identifies the effective use of mineral resources and the avoidance of sterilisation of unworked reserves as clear benefits of the proposal. That carries substantial weight. Mineral resources can only be worked where they occur, and it is generally more efficient and sustainable to make prudent use of an established quarry resource than to disregard it while pressure for future supply is directed elsewhere.

The site can also contribute to continuity and resilience of supply. The candidate site statement

expressly states that continued quarrying at the wider site would provide continuity in mineral supply at this location and contribute to resilience through the provision of a consistent supply over the plan period and beyond. Existing operational or consented sites will often provide a more realistic and deliverable source of continuing supply than wholly new mineral sites.
Continued extraction would also support the construction industry through the provision of an adequate and continuous supply of minerals. This sits comfortably with BP25's recognition that the Vale is an "important supplier of Carboniferous limestone for general aggregate use" .
There are also local economic benefits. The candidate site submission refers to the maintenance of local economic benefits. An established quarrying operation supports employment, haulage, plant use, contractors and associated supply chains. Continued recognition of the site therefore supports local economic activity as well as mineral supply.
Environmental and restoration benefits are also relevant. The candidate site statement refers to benefits through new planting and habitat creation and treats restoration as part of the overall site concept. Continued quarrying should therefore not be considered solely in terms of extraction. It also creates the opportunity to secure restoration, habitat creation, landscape management and long-term after-use benefits through a modern planning framework.
A further important benefit is that any continued working would proceed under modern planning controls. The ROMP approval confirms that continued extraction has been reviewed through a contemporary planning process, that updated conditions now regulate the site, that the quarry must be worked in accordance with an approved working scheme, that annual production is capped at 250,000 tonnes, and that extraction may continue until 21 February 2042. That provides a robust and sustainable planning basis for future quarrying.
Continued recognition of Pant-y-Ffynnon Quarry within the Deposit RLDP would also ensure that the site remains properly integrated into the authority's safeguarding, buffer and minerals policy framework. That would provide clarity, consistency and transparency in the Plan.
6. Changes sought
The Deposit RLDP should not treat the absence of a current RTS2 requirement for further allocations as determinative of the planning treatment of Pant-y-Ffynnon Quarry.
The Plan should continue to recognise the consented quarry element positively within the minerals strategy.
The wider site should remain properly safeguarded within the minerals safeguarding and quarry buffer framework.
The supporting text should make clear that the absence of a new allocation reflects only the current RTS2 quantitative position and not any conclusion that the site is unsuitable in principle for continued quarrying.
The Plan should rely on its existing minerals development management policies, together with the ROMP framework and any future application process, to assess the detailed merits of continued working, associated development and restoration proposals at the site.
That approach would better reflect the site's planning status, the candidate site evidence, the ROMP determination and the wider objective of maintaining a sound and effective minerals strategy in the Vale of Glamorgan.
7. Conclusion
The Council's reliance on the statement that the 2nd Review of the Minerals Regional Technical Statement indicates that no further allocations are specifically required within the Vale of Glamorgan RLDP is too narrow a basis on which to assess Pant-y-Ffynnon Quarry.
That statement may explain why the Council has not identified a new formal mineral allocation on numerical grounds. It does not, however, justify removing or diluting positive recognition of an existing quarry site with an established planning status, a recent ROMP approval permitting continued extraction until 21 February 2042, and clear evidence of continuing supply, economic and restoration benefits.
Pant-y-Ffynnon Quarry should therefore continue to be positively recognised as part of the Vale of Glamorgan's minerals framework. The Deposit RLDP should distinguish clearly between the absence of a current need for a fresh allocation and the continuing strategic relevance of an established quarry site. In the case of Pant-y-Ffynnon Quarry, the latter plainly remains.
8. Summary
 Overall minerals strategy: Support in part / Object in part.
Seth Hill & Son Ltd supports the general objective of maintaining an adequate minerals supply and managing mineral resources through a plan-led framework. Objection is taken to the extent that the Deposit RLDP relies too narrowly on the RTS2 conclusion that no further allocations are specifically required, without properly reflecting the continuing role of Panty-Ffynnon Quarry as an existing quarry site with ongoing strategic relevance.
 Strategic minerals policy / supply and safeguarding approach: Support in part / Object in part.
The strategic objective of securing a continuous supply of minerals and safeguarding mineral resources is supported. Objection is taken insofar as that strategic approach is not properly applied to Pant-y-Ffynnon Quarry, which should continue to be recognised positively within the minerals framework notwithstanding the absence of a current need for a fresh allocation.
 Policy MIN1 – Mineral safeguarding areas: Support.
Support is given to the safeguarding of limestone resources from unnecessary sterilisation.

That approach is directly relevant to Pant-y-Ffynnon Quarry, particularly given that the candidate site submission sought to retain quarry status for the consented element and to safeguard the wider site for longer-term quarrying.
 Policy MIN2 – Quarry buffer zones: Support.
The principle of retaining quarry buffer zones is supported because it protects existing and future quarrying operations from encroachment by incompatible development. Continued positive recognition of Pant-y-Ffynnon Quarry sits logically alongside that buffer framework.
 Policy MIN4 – Sustainable mineral working: Support in principle.
Support is given to the policy framework for new workings, extensions and continued mineral extraction subject to environmental safeguards, amenity protection and restoration. Pant-y-Ffynnon Quarry is capable of being assessed under that framework, and detailed issues should be dealt with through the policy and application process rather than by withholding positive plan recognition now.
 Candidate Site Assessment – Pant-y-Ffynnon Quarry: Object.
Objection is taken to the candidate site assessment insofar as it relies on the statement that no further allocations are specifically required under RTS2 as the reason for not taking the site forward positively. That reasoning is too narrow because it fails to engage with the fact that the site is an existing quarrying location, that the candidate submission sought retention of quarry status as well as longer-term safeguarding, and that the site has benefited from ROMP approval ref. 2024/00246/ENV, which permits operations until 21 February 2042.
 Status of the existing quarry site: Object to insufficient recognition.
Seth Hill & Son Ltd objects to any approach which treats Pant-y-Ffynnon Quarry as strategically unimportant simply because no new allocation is numerically required. The consented quarry element should continue to be positively recognised in the Plan, reflecting its existing planning status, updated ROMP conditions and ongoing minerals planning context.
 Benefits of continued extraction at Pant-y-Ffynnon Quarry: Positive material consideration.
Continued extraction would make productive use of an existing quarry site, avoid sterilisation of unworked reserves, provide continuity and resilience of mineral supply, support local economic benefits and allow restoration-led environmental gains through planting, habitat creation and long-term after-use. Those benefits weigh in favour of continued positive recognition of the site within the Deposit RLDP.
 Soundness and evidence base: Object to insufficiently evidence-led treatment.
The Development Plans Manual requires plans to be based on “robust evidence” so they can be delivered and links candidate sites directly to the soundness question “Will the plan deliver?” The current treatment of Pant-y-Ffynnon Quarry does not fully reflect the evidence
before the Council on the site’s planning status, deliverability and continuing operational role.
 National policy compliance – PPW, MTAN1 and SWRAWP: Support in principle / Object to incomplete application.
The broad alignment of the Deposit RLDP with national minerals policy is supported. The objection is that the Plan does not go far enough in applying PPW’s reference to “real possibilities for future mineral working”, MTAN1’s requirement for a “more realistic landbank assessment”, and SWRAWP’s warning that “Caution must be exercised in using these landbank figures” when considering the ongoing role of Pant-y-Ffynnon Quarry.
 Overall position: Support in part / Object in part.
In overall terms, Seth Hill & Son Ltd supports the Deposit RLDP’s broad minerals framework. The objection is a focused one: the Plan should more clearly distinguish between the absence of a current need for a fresh mineral allocation and the continuing strategic relevance of Panty-Ffynnon Quarry as an established quarry site with planning status, ongoing supply potential and a recent ROMP approval extending operations beyond the plan period.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Deposit Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3x9
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xb
Email Representation - https://valeofglamorgan.oc2.uk/a/3xc

7118 Object

Document Element: SP18 - SUSTAINABLE PROVISION OF MINERALS
Respondent: Seth Hill & Son Ltd [1197]
Agent: Highlight Planning

Summary:

Objection is taken to the extent that the Deposit RLDP relies too narrowly on the RTS2 conclusion that no further allocations are specifically required.

Full text:

REPRESENTATIONS TO THE DEPOSIT VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036 ON BEHALF OF SETH HILL AND SON LTD

1. Introduction

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They relate specifically to the treatment of Pant-y-Ffynnon Quarry / Seth Hill Quarry, Bonvilston in the Deposit Plan and the associated candidate site assessment process.

The principal concern arises from the Council's candidate site assessment, which states that a positive allocation for mineral working is not included because "The 2nd Review of the Minerals Regional Technical Statement indicates no further allocations are specifically required to be identified within the Vale of Glamorgan RLDP."

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The candidate site statement also recorded the continuing active planning context at the site, including application ref. 2021/01379/FUL for the resumption of limestone extraction in the North Quarry, the establishment of an aggregates recycling facility, and restoration of the North Quarry using inert waste materials. That position has since been materially reinforced by the ROMP determination.

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Taken together, that evidence confirms that the site is not simply a historic quarry with uncertain prospects. It is an active quarry with a recently updated modern conditions framework and an extraction end date beyond the RLDP period.

3. Objection to the candidate site assessment

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The statement that no further allocations are specifically required may explain why the Council has concluded that it does not presently need to identify a fresh minerals allocation in order to meet the current quantitative apportionment. It does not, however, address the separate issue of how the Plan should treat an existing quarry site such as Pant-y-Ffynnon Quarry.

The absence of a current need for a new allocation is not the same as a conclusion that an established quarry site should cease to be positively recognised, should no longer be meaningfully safeguarded, or should be treated as strategically unimportant.

The candidate site submission itself demonstrates why the Council's reasoning is incomplete. The submission did not merely seek a fresh allocation on the basis of additional tonnage need. It sought retention of the existing quarry status of the consented element and safeguarding of the wider site for longer-term quarrying potential.

The ROMP decision strengthens that point considerably. A site that has recently been granted updated mineral working conditions and is authorised to continue operations until 21 February 2042 cannot sensibly be treated as though its future role is immaterial simply because current RTS2 figures do not require a further allocation elsewhere in the Vale.

The Council's approach is also difficult to reconcile with national plan-making guidance. The Development Plans Manual states that plans should be based on "robust evidence" so they can be delivered, that candidate sites should not be purposefully excluded from assessment, and that the key objective is whether a promoter has a serious intention to bring the site forward, which links directly to the soundness question "Will the plan deliver?"

In those circumstances, the candidate site assessment appears to conflate two distinct questions:

whether a new specific allocation is numerically required under RTS2, and whether an established quarry site should continue to be positively recognised and safeguarded in the Plan. Those questions are not the same. The former may currently be answered in the negative. The latter, in the case of Pant-y-Ffynnon Quarry, should plainly be answered in the affirmative.

4. National and local policy context

The wider policy and evidence framework supports a more positive treatment of Pant-y-Ffynnon Quarry than is reflected in the candidate site assessment.

PPW states that it is in the interests of the minerals industry that landbanks reflect “real possibilities for future mineral working” and adds that authorities should provide “a clear guide to where nonenergy mineral extraction is likely to be acceptable”.

MTAN1 explains that development plans should identify “dormant reserves” separately and states that “A more realistic landbank assessment is the aim of this process” so that a more accurate picture emerges of reserves “that are likely to have real potential for future working”. It also states that the future landbank should include land specifically allocated for the working of aggregates as an “extended landbank”.

The SWRAWP RTS reinforces the point that reserve arithmetic is not the whole picture. It states that “Caution must be exercised in using these landbank figures” because the calculation does not take account of geographical or operational aspects, changes in planning policy, protected site designations or other permitting constraints. This is particularly relevant given the increasingly important role of NRW licensing and abstraction controls, including quarry dewatering considerations, which may mean that some reserves are no longer as readily available or economically viable as historic landbank figures imply. Accordingly, apparent reserve sufficiency in quantitative terms may overstate the extent of genuinely deliverable supply. SWRAWP also confirms that dormant reserves “must be counted separately”.

The Deposit RLDP’s own framework is consistent with that broader policy approach. The Plan safeguards known limestone resources and retains quarry buffer zones so that incompatible development does not prejudice mineral operations or future working. BP25 explains that the RLDP safeguards finite mineral resources for future generations and protects them from permanent development that could sterilise or hinder extraction.

The Plan also provides a detailed framework for sustainable mineral working, including new workings, extensions and the reworking or reopening of old workings. That mechanism is intended to deal with the detailed merits of mineral proposals, including environmental effects, amenity, hydrology, transport and restoration. There is therefore no sound policy basis for adopting an unduly negative position toward Pant-y-Ffynnon Quarry at plan-making stage simply because no fresh allocation is currently required.

5. Benefits of continued extraction at Pant-y-Ffynnon Quarry

Continued extraction at Pant-y-Ffynnon Quarry would give rise to a number of important site-specific and strategic benefits.

PPW expressly recognises the planning advantages of extending established quarry sites. Paragraph 5.14.48 states that “The presence of an existing quarry should be a material consideration when considering a proposal for an extension. There may be benefits to extending a site in terms of shared infrastructure, for instance, as opposed to working a new greenfield site.” That principle is directly relevant to Pant-y-Ffynnon Quarry. The site is an existing quarrying location with an established operational and planning context, and any continued working or extension would be able to build upon that existing quarrying footprint, associated infrastructure and minerals land use relationship. In planning terms, that is materially preferable to directing future working to an entirely new greenfield location, and it reinforces the case for the Deposit RLDP to continue to recognise the site positively within the minerals strategy rather than treating it as strategically unimportant simply because no fresh allocation is currently required.

The site is an existing quarrying location with an established mineral planning history. Continued extraction would therefore amount to the continuation and proper management of an existing quarrying use rather than the introduction of mineral development into a wholly new location. That is a material land use consideration.

The candidate site statement identifies the effective use of mineral resources and the avoidance of sterilisation of unworked reserves as clear benefits of the proposal. That carries substantial weight. Mineral resources can only be worked where they occur, and it is generally more efficient and sustainable to make prudent use of an established quarry resource than to disregard it while pressure for future supply is directed elsewhere.

The site can also contribute to continuity and resilience of supply. The candidate site statement expressly states that continued quarrying at the wider site would provide continuity in mineral supply at this location and contribute to resilience through the provision of a consistent supply over the plan period and beyond. Existing operational or consented sites will often provide a more realistic and deliverable source of continuing supply than wholly new mineral sites.

Continued extraction would also support the construction industry through the provision of an adequate and continuous supply of minerals. This sits comfortably with BP25’s recognition that the Vale is an “important supplier of Carboniferous limestone for general aggregate use” .

There are also local economic benefits. The candidate site submission refers to the maintenance of local economic benefits. An established quarrying operation supports employment, haulage, plant use, contractors and

associated supply chains. Continued recognition of the site therefore supports local economic activity as well as mineral supply.
Environmental and restoration benefits are also relevant. The candidate site statement refers to benefits through new planting and habitat creation and treats restoration as part of the overall site concept. Continued quarrying should therefore not be considered solely in terms of extraction. It also creates the opportunity to secure restoration, habitat creation, landscape management and long-term after-use benefits through a modern planning framework.
A further important benefit is that any continued working would proceed under modern planning controls. The ROMP approval confirms that continued extraction has been reviewed through a contemporary planning process, that updated conditions now regulate the site, that the quarry must be worked in accordance with an approved working scheme, that annual production is capped at 250,000 tonnes, and that extraction may continue until 21 February 2042. That provides a robust and sustainable planning basis for future quarrying.
Continued recognition of Pant-y-Ffynnon Quarry within the Deposit RLDP would also ensure that the site remains properly integrated into the authority's safeguarding, buffer and minerals policy framework. That would provide clarity, consistency and transparency in the Plan.
6. Changes sought
The Deposit RLDP should not treat the absence of a current RTS2 requirement for further allocations as determinative of the planning treatment of Pant-y-Ffynnon Quarry.
The Plan should continue to recognise the consented quarry element positively within the minerals strategy.
The wider site should remain properly safeguarded within the minerals safeguarding and quarry buffer framework.
The supporting text should make clear that the absence of a new allocation reflects only the current RTS2 quantitative position and not any conclusion that the site is unsuitable in principle for continued quarrying.
The Plan should rely on its existing minerals development management policies, together with the ROMP framework and any future application process, to assess the detailed merits of continued working, associated development and restoration proposals at the site.
That approach would better reflect the site's planning status, the candidate site evidence, the ROMP determination and the wider objective of maintaining a sound and effective minerals strategy in the Vale of Glamorgan.
7. Conclusion
The Council's reliance on the statement that the 2nd Review of the Minerals Regional Technical Statement indicates that no further allocations are specifically required within the Vale of Glamorgan RLDP is too narrow a basis on which to assess Pant-y-Ffynnon Quarry.
That statement may explain why the Council has not identified a new formal mineral allocation on numerical grounds. It does not, however, justify removing or diluting positive recognition of an existing quarry site with an established planning status, a recent ROMP approval permitting continued extraction until 21 February 2042, and clear evidence of continuing supply, economic and restoration benefits.
Pant-y-Ffynnon Quarry should therefore continue to be positively recognised as part of the Vale of Glamorgan's minerals framework. The Deposit RLDP should distinguish clearly between the absence of a current need for a fresh allocation and the continuing strategic relevance of an established quarry site. In the case of Pant-y-Ffynnon Quarry, the latter plainly remains.
8. Summary
 Overall minerals strategy: Support in part / Object in part.
Seth Hill & Son Ltd supports the general objective of maintaining an adequate minerals supply and managing mineral resources through a plan-led framework. Objection is taken to the extent that the Deposit RLDP relies too narrowly on the RTS2 conclusion that no further allocations are specifically required, without properly reflecting the continuing role of Panty-Ffynnon Quarry as an existing quarry site with ongoing strategic relevance.
 Strategic minerals policy / supply and safeguarding approach: Support in part / Object in part.
The strategic objective of securing a continuous supply of minerals and safeguarding mineral resources is supported. Objection is taken insofar as that strategic approach is not properly applied to Pant-y-Ffynnon Quarry, which should continue to be recognised positively within the minerals framework notwithstanding the absence of a current need for a fresh allocation.
 Policy MIN1 – Mineral safeguarding areas: Support.
Support is given to the safeguarding of limestone resources from unnecessary sterilisation. That approach is directly relevant to Pant-y-Ffynnon Quarry, particularly given that the candidate site submission sought to retain quarry status for the consented element and to safeguard the wider site for longer-term quarrying.
 Policy MIN2 – Quarry buffer zones: Support.
The principle of retaining quarry buffer zones is supported because it protects existing and future quarrying operations from encroachment by incompatible development. Continued positive recognition of Pant-y-Ffynnon Quarry sits logically alongside that buffer framework.
 Policy MIN4 – Sustainable mineral working: Support in principle.
Support is given to the policy framework for new workings, extensions and continued mineral

extraction subject to environmental safeguards, amenity protection and restoration. Pant-y-Ffynnon Quarry is capable of being assessed under that framework, and detailed issues should be dealt with through the policy and application process rather than by withholding positive plan recognition now.

 Candidate Site Assessment – Pant-y-Ffynnon Quarry: Object.

Objection is taken to the candidate site assessment insofar as it relies on the statement that no further allocations are specifically required under RTS2 as the reason for not taking the site forward positively. That reasoning is too narrow because it fails to engage with the fact that the site is an existing quarrying location, that the candidate submission sought retention of quarry status as well as longer-term safeguarding, and that the site has benefited from ROMP approval ref. 2024/00246/ENV, which permits operations until 21 February 2042.

 Status of the existing quarry site: Object to insufficient recognition.

Seth Hill & Son Ltd objects to any approach which treats Pant-y-Ffynnon Quarry as strategically unimportant simply because no new allocation is numerically required. The consented quarry element should continue to be positively recognised in the Plan, reflecting its existing planning status, updated ROMP conditions and ongoing minerals planning context.

 Benefits of continued extraction at Pant-y-Ffynnon Quarry: Positive material consideration.

Continued extraction would make productive use of an existing quarry site, avoid sterilisation of unworked reserves, provide continuity and resilience of mineral supply, support local economic benefits and allow restoration-led environmental gains through planting, habitat creation and long-term after-use. Those benefits weigh in favour of continued positive recognition of the site within the Deposit RLDP.

 Soundness and evidence base: Object to insufficiently evidence-led treatment.

The Development Plans Manual requires plans to be based on “robust evidence” so they can be delivered and links candidate sites directly to the soundness question “Will the plan deliver?” The current treatment of Pant-y-Ffynnon Quarry does not fully reflect the evidence before the Council on the site’s planning status, deliverability and continuing operational role.

 National policy compliance – PPW, MTAN1 and SWRAWP: Support in principle / Object to incomplete application.

The broad alignment of the Deposit RLDP with national minerals policy is supported. The objection is that the Plan does not go far enough in applying PPW’s reference to “real possibilities for future mineral working”, MTAN1’s requirement for a “more realistic landbank assessment”, and SWRAWP’s warning that “Caution must be exercised in using these landbank figures” when considering the ongoing role of Pant-y-Ffynnon Quarry.

 Overall position: Support in part / Object in part.

In overall terms, Seth Hill & Son Ltd supports the Deposit RLDP’s broad minerals framework. The objection is a focused one: the Plan should more clearly distinguish between the absence of a current need for a fresh mineral allocation and the continuing strategic relevance of Panty-Ffynnon Quarry as an established quarry site with planning status, ongoing supply potential and a recent ROMP approval extending operations beyond the plan period.

Change suggested by respondent:

The supporting text should make clear that the absence of a new allocation reflects only the current RTS2 quantitative position.

Sound: Not specified

Attachments:

Deposit Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3x9
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xb
Email Representation - https://valeofglamorgan.oc2.uk/a/3xc

7125 Support

Document Element: SP18 - SUSTAINABLE PROVISION OF MINERALS

Respondent: Tom Prichard (Holdings) Ltd [3738]

Agent: Highlight Planning

Summary:

The respondent supports the overarching strategy of maintaining a continuous supply of minerals, safeguarding mineral resources and avoiding sterilisation.

Full text:

REPRESENTATIONS TO THE DEPOSIT VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036 ON BEHALF OF TOM PRICHARD (HOLDINGS) LTD

1. Introduction

These representations are submitted on behalf of Tom Prichard (Holdings) Ltd in respect of the Deposit Vale of Glamorgan Replacement Local Development Plan 2021–2036. They relate specifically to the Plan’s minerals strategy and policy framework, the treatment of dormant mineral sites, and the candidate site assessment and supporting evidence relating to Argoed Isha Quarry, Llansannor.

The respondent supports the broad direction of the Deposit RLDP minerals framework, but contends that the Plan is unsound in part in the way it presently treats Argoed Isha Quarry. The central point is straightforward: the Council's own evidence accepts that usable reserves remain at the site, that those reserves could still be extracted if required, and that the site has the potential to be reworked. Yet that conclusion is not carried through into a sufficiently positive and coherent plan-led position.

The objection is therefore not to the principle of maintaining a minerals strategy founded on safeguarding, environmental protection and modern control of extraction. Nor is it suggested that the Plan must necessarily allocate Argoed Isha as a new specific site simply because a candidate site was submitted. Rather, the objection is that the Deposit RLDP does not properly reflect the evidential position it has itself reached. It acknowledges that Argoed Isha should not be made subject to a Prohibition Order, but stops short of recognising clearly that the site remains a dormant limestone quarry with continuing mineral significance, realistic future reactivation potential and scope for future working under modern planning controls, restoration obligations and biodiversity enhancement.

2. Site context and planning status

Argoed Isha is a long-established limestone quarry. The candidate site planning statement explains that the site has a historic quarry planning status, that recommencement would require updated working conditions, and that the site was promoted through the candidate site process precisely because there remains interest in recommencing mineral extraction. The same statement records the local planning authority's earlier position that, in relation to a previous proposal, the Council could only seek a Prohibition Order if it was satisfied that resumption of extraction was unlikely, but that "this requirement is not met" at Argoed Isha because of continuing interest in re-opening the quarry. It also records the mineral adviser's view that "The site currently has planning permission for a quarry" and that, absent relinquishment, "the permission to quarry remains valid".

The candidate site material also addresses availability and deliverability. It states that the site is available for development, that the proposal is considered viable and deliverable owing to the underlying need for the mineral, and that the site is a brownfield / underutilised site. It further notes that the proposal comprises mineral development within a mineral safeguarding area and within a site which benefits from a planning permission for quarrying, such that it is considered acceptable in principle. Those points are important because they show that Argoed Isha is not simply a theoretical reserve detached from any realistic prospect of future use.

3. Soundness and the role of evidence

The Development Plans Manual states that plans should be based on robust evidence so they can be delivered and that LPAs must be able to demonstrate, in broad terms, that the plan is deliverable with no significant impediments to implementation. It also emphasises the importance of a detailed candidate site process and of ensuring delivery and viability are embedded in that process from the outset. Elsewhere, the Manual explains that the plan-making process should prepare more effective, efficient and deliverable plans and refers expressly to the tests of soundness which must be satisfied if a development plan is to be recommended for adoption.

Those principles matter here because the Council had before it a candidate site submission which set out the site's planning status, constraints, deliverability and rationale for retention as a mineral site. It also had its own local evidence in BP25 and the wider regional evidence from RTS2, the sub-regional collaboration work and SWRAWP. In those circumstances, a sound plan ought to explain clearly how that evidence has informed the Council's chosen strategy for Argoed Isha. In the respondent's submission, the Deposit RLDP presently falls short because it recognises part of the evidence, but not its full implications. The Plan is therefore unsound in part because it is not fully justified by the evidence and is not as effective as it should be in setting out a coherent future approach to this dormant but still viable mineral resource.

4. National policy context – Planning Policy Wales

Planning Policy Wales establishes the national context for these representations. It requires planning authorities to maintain landbanks for non-energy minerals in demand and states that, for crushed rock, a minimum ten-year landbank should be maintained through the plan period unless agreement is reached for other authorities to make a compensating increase in provision. PPW also recognises that individual authority boundaries are not always an adequate basis for landbank policy where environmental constraints are too important or workable resources too limited, in which case authorities must agree a joint approach with neighbouring authorities in line with regional arrangements.

PPW is especially important in relation to inactive sites. Paragraph 5.14.17 provides that inactive sites with planning permission for future working which are considered unlikely to be reactivated should be identified in the development plan and should be the subject of a suitable strategy, which could include prohibition orders, restoration and aftercare proposals, and a suitable proposed after-use. Paragraph 5.14.18 then states that "It is in the interests of the minerals industry that landbanks reflect real possibilities for future mineral working" and adds that, where sites have been inactive and "there is no prospect of future working", authorities should consider the use of prohibition orders.

That distinction is central to the present case. The Council has not concluded that there is no prospect of future working at Argoed Isha. Quite the contrary: BP25 states that usable reserves remain at the site, that they could be extracted if required, and that they have the potential to be reworked. The logic of PPW is therefore that Argoed Isha is not a site to be treated as effectively closed or exhausted. It remains a site with continuing mineral relevance, albeit one that would require modern conditions and

a fresh scheme of workings before any extraction could recommence.
PPW is also directly relevant to areas of future working. Paragraph 5.14.19 states that "Where necessary, planning authorities should provide a clear guide to where non-energy mineral extraction is likely to be acceptable" and that policies and proposals should cover mineral resources "which are currently used or which may need to be used in the foreseeable future". It further explains that such areas should be clearly identified on a proposals map and may take the form, in order of preference, of specific sites, preferred areas or areas of search.
The respondent does not suggest that PPW compels the Council to identify Argoed Isha as a specific site. However, PPW plainly supports a more positive and more explicit plan-led recognition of sites which retain real future mineral potential. Once the Council's own evidence accepts that Argoed Isha is such a site, it is difficult to reconcile a largely passive policy response with the national expectation that development plans should give a clear guide to where future mineral working may be acceptable.
5. National policy context – MTAN1
MTAN1 reinforces the need for a realistic and evidence-based approach to landbanks and dormant sites. It explains that a landbank is composed of permitted reserves at active and inactive sites, and that development plans should include an assessment of both the current and future landbank. Paragraph 47 then states that development plans should identify those sites that are dormant and count these as "dormant reserves" to be clearly shown in landbank calculations as a separate category. Paragraph 48 continues by stating that a more realistic approach is required, observing that extensive historic landbanks can perpetuate unsustainable supply patterns if left unaltered. MTAN1 therefore states that "A more realistic landbank assessment is the aim of this process" so that a more accurate picture is obtained of permitted reserves "that are likely to have real potential for future working".
That policy language is highly material. It confirms that dormant reserves are not irrelevant simply because they are not counted within the active landbank. They are to be identified separately and realistically assessed. That is precisely the position that should be taken with Argoed Isha. The Council has already undertaken the essential assessment in substance through BP25 and has concluded that usable reserves remain and that the site has the potential to be reworked. MTAN1 therefore supports a more nuanced and more positive treatment of the site than a simple "no allocation required" conclusion.
MTAN1 also recognises that in some authorities it may not be possible or acceptable to provide an adequate current or extended landbank because of environmental designations, limited suitable resources, or amenity considerations, and that RAWPs should consider the environmental capacity of authorities to supply aggregates. This is an important reminder that reserve arithmetic is not the only issue. Deliverability, environmental capacity, and the practical availability of reserves remain relevant.
6. Apportionment and Plan Period
The regional and sub-regional evidence does not undermine the respondent's case. It explains why there is no present quantitative requirement for a further minerals allocation in the Vale, but it does not justify a negative or dismissive treatment of Argoed Isha.
BP25 records the RTS2 and Statement of Sub-Regional Collaboration position for the Cardiff City subregion. Table 5 identifies the Vale of Glamorgan apportionment for crushed rock as 17.05 million tonnes over 25 years, with existing permitted reserves of 18.73 million tonnes at the end of 2016 and a minimum allocation needed of 0, alongside 13 million tonnes of additional reserves at dormant sites. BP25 then states that, based on those figures, the SSRC identifies that the Vale of Glamorgan does not require any allocations for future workings of crushed rock to be identified within the RLDP.
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated review of mineral reserves) would therefore ensure a sound plan.
Notwithstanding our comment in respect of the Plan Period, we remain concerned of how the Plan should treat a dormant site which the Council accepts has remaining usable reserves and realistic reactivation potential. Nor does it justify treating Argoed Isha as though it lacked future significance.
The respondent's case is therefore not that the RTS2 figure is wrong, but that it has been taken too far. A conclusion that no additional formal allocation is presently required is not the same thing as a conclusion that the site has no future role.
7. BP25 – the Council's own minerals evidence
BP25 is the most important local evidence document for present purposes. It records that the Vale of Glamorgan is an "important supplier of Carboniferous limestone for general aggregate use". It then addresses dormant mineral sites in the Vale. Paragraphs 5.48 to 5.50 explain that many dormant sites have not been worked for many years and are considered unlikely to be worked in the future; accordingly, the Council intends to serve Prohibition Orders on those sites, which would provide certainty for nearby

residents and remove reserves which are not realistically available. BP25 also explains that the level of reserves at dormant sites is not counted in the landbank.

Crucially, BP25 then distinguishes Argoed Isha from that general class of dormant sites. Paragraph 5.51 states: "While Argoed Isha quarry is classified as 'dormant', useable reserves remain at the site and could be extracted if required." It goes on to record that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030, but then adds: "While the reserves at the site are not included in the current landbank, they have the potential to be reworked and therefore a Prohibition Order will not be served at Argoed Isha Quarry until the current circumstances change."

That is a very clear evidential conclusion. BP25 does not simply refrain from prohibiting the site without explanation. It positively explains why Argoed Isha is different: usable reserves remain, they could be extracted if required, and they have the potential to be reworked. In the respondent's submission, that conclusion requires a correspondingly clearer and more positive policy response within the Deposit RLDP than is presently provided.

BP25 is also supportive on restoration and aftercare. It states that the serving of Prohibition Orders is intended to provide certainty and, where necessary, restoration of sites may be sought. More broadly, the background paper recognises the importance of sustainable minerals management and balancing mineral extraction with environmental protection and community well-being. That policy background is entirely consistent with the respondent's case that any future working at Argoed Isha should be controlled through a modern framework of environmental safeguards and restoration-led after-use.

8. SWRAWP Annual Report 2024

The SWRAWP Annual Report 2024 is also highly relevant because it warns against over-reliance on headline landbank figures. Paragraph 4.10 states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects that may restrict the availability of certain reserves, nor constraints arising from changes in planning policy, protected site designation or other non-planning permitting requirements. Paragraph 4.11 then confirms that dormant sites have not been included in landbank calculations and that local planning authorities should carry out their own assessments of the likelihood of reactivation, but that in any event "dormant reserves must be counted separately".

That evidence materially supports the respondent's case. It shows that the statement "no further allocations are specifically required" is not, in itself, the end of the analysis. Landbank figures are a starting point, but they do not tell the whole story. Questions of practical availability, regulatory and environmental constraints elsewhere, and the separate role of dormant reserves remain relevant. Argoed Isha therefore retains importance as part of the broader mineral resource picture even though it is not part of the active landbank.

9. Response to the Council's candidate site assessment

The Council's candidate site assessment records that a positive allocation for mineral working is not included because "the 2nd Review of the Minerals Regional Technical Statement indicates no further allocations are specifically required to be identified within the Vale of Glamorgan RLDP". That point should be addressed directly.

The respondent accepts that the RTS2 position explains why the Council may have concluded that there is no immediate need for a fresh mineral allocation in quantitative terms. However, that is not a sufficient reason, on its own, to reject a more positive policy treatment of Argoed Isha or to give the impression that the site lacks future significance. BP25 itself shows why. It records both that the Vale does not presently require additional allocations and, separately, that Argoed Isha retains remaining usable reserves and has the potential to be reworked. Those two propositions are not inconsistent. They point toward a more nuanced and more accurate conclusion: namely, that Argoed Isha may not need to be allocated now to meet a current numerical shortfall, but it remains a dormant limestone reserve of continuing strategic relevance that should be positively recognised within the Plan.

That approach is also supported by PPW, MTAN1 and SWRAWP. PPW states that landbanks should reflect "real possibilities for future mineral working" and that prohibition orders are appropriate where there is "no prospect of future working". MTAN1 requires dormant reserves to be separately identified and assessed so as to achieve "A more realistic landbank assessment". SWRAWP says that "Caution must be exercised" in using landbank figures and that dormant reserves must be counted separately. Those documents all point to a need for a broader planning judgment than simple reserve arithmetic.

Accordingly, the flaw in the candidate site reasoning is not that it refers to the RTS2 position, but that it appears to stop there. In the respondent's submission, the sounder and more evidence-based approach would have been either to give the site more positive recognition in the Plan's supporting text, or at the very least to make clear that the site was not allocated because no immediate additional allocation was required, not because the site lacked merit, availability or future potential.

Moreover, SWRAWP reinforces the point that reserve arithmetic is not the whole picture. It states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects, changes in planning policy, protected site designations or other permitting constraints. This is particularly relevant given the increasingly important role of NRW licensing and abstraction controls, including quarry dewatering considerations, which may mean that some reserves are no longer as readily available or economically viable as historic landbank figures imply. Accordingly, apparent reserve sufficiency in quantitative terms may

overstate the extent of genuinely deliverable supply.
10. The existing temporary training permission does not sterilise the reserve
BP25 states that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030. The significance of that point is not that the site has permanently moved away from minerals. The significance is the opposite: BP25 records the temporary training use while simultaneously concluding that usable reserves remain and may be reworked, and that a Prohibition Order should therefore not be served.
In planning terms, a temporary training use of this kind cannot properly be treated as sterilising the mineral reserve. PPW's safeguarding policy is concerned with preventing sterilisation by permanent development. A time-limited interim use, particularly one expressly acknowledged in BP25 as coexisting with a potentially reworkable reserve, does not extinguish the underlying mineral significance of the site. The temporary training use should therefore be understood as an interim overlay rather than a permanent change in land use character.
11. Benefits of continued extraction at Argoed Isha Quarry
Continued extraction at Argoed Isha Quarry would give rise to a number of site-specific and strategic benefits which the Deposit RLDP should recognise when considering the future role of the site.
The site is not a greenfield mineral proposal on an entirely undeveloped site. It is an existing quarry with a long-established mineral planning history and extant mineral status in principle, subject to updated modern conditions. The principle of mineral working at the site is therefore already established in land use terms, and the future reworking of the reserve would represent the continuation of an existing mineral use rather than the introduction of quarrying into a wholly new location. That is a material distinction when considering the appropriateness of retaining the site as a realistic future mineral resource.
Continued extraction would also assist in making use of a proven local limestone resource in the Vale of Glamorgan, rather than forcing greater reliance on more distant or more constrained sources. BP25 confirms that the Vale is an "important supplier of Carboniferous limestone for general aggregate use". In practical terms, continued extraction at Argoed Isha would accord with the proximity principle by helping to meet demand from a comparatively well-located source close to markets in the Vale and wider Cardiff area, rather than depending unduly on more remote sources or on supply patterns that may become more constrained over time.
The site would also contribute to the resilience and flexibility of the wider minerals supply position. Even if no immediate additional allocation is numerically required under RTS2, national and regional policy make clear that landbank figures are not the only relevant consideration. A dormant quarry with remaining usable reserves provides contingency, flexibility and productive capacity in the event that supply circumstances change during the plan period. This is especially important where SWRAWP warns that landbank figures do not capture geographical, operational, policy or other permitting constraints, and where MTAN1 requires a realistic view of reserves with future potential. Argoed Isha therefore has value not merely as a theoretical reserve, but as part of a resilient longer-term supply position.
Continued extraction at Argoed Isha would also support local supply chains and a more diverse quarrying sector. The candidate site submission identified the benefit of maintaining provision from a range of operators, including smaller and medium-sized businesses, rather than relying only on a limited number of larger established sites. In planning terms, that diversity is relevant to continuity of supply, competition, responsiveness to local demand and the overall resilience of the minerals sector in the Vale and wider region.
A further benefit is that any future extraction would be carried out under modern planning control rather than being left sterilised or underused. If the site is reworked in future, that would necessarily be through a fresh scheme of modern conditions and under the policy framework of the RLDP and national minerals policy. Issues such as traffic, hydrology, hydrogeology, ecology, landscape, amenity, blasting, dust, restoration and long-term aftercare would all be capable of being addressed through a contemporary planning and environmental control regime. That is an important benefit in itself, because it means any future extraction would not take place under outdated historic controls, but under a modern framework designed to secure sustainable mineral working.
Continued extraction would also create the opportunity for a comprehensive restoration and aftercare strategy delivering environmental gains. PPW recognises that restoration and aftercare proposals for inactive sites may include natural re-vegetation for nature conservation and ecological interests. BP25 records that restoration may be sought where necessary. In practice, any future extraction proposal at Argoed Isha could be accompanied by a restoration-led scheme involving landform improvement, habitat creation, ecological enhancement and long-term stewardship. The site should therefore not be seen simply as a mineral reserve, but as a place where carefully managed extraction could unlock biodiversity, landscape and geodiversity benefits over time.
The site also represents the productive use of an underutilised brownfield quarry. The candidate site material identifies it as a brownfield / underutilised site. In land use terms, there is a clear logic in making effective use of an existing quarried landscape with established mineral status, rather than placing additional pressure on wholly undeveloped land elsewhere. In this case, the Council's own evidence confirms the key factor: usable reserves remain and the site has the potential to be reworked.
There is finally a longer-term safeguarding benefit in recognising the case for continued extraction.

PPW requires mineral resources to be safeguarded to prevent sterilisation by permanent development, and makes clear that landbanks should reflect “real possibilities for future mineral working”. Positive recognition of the benefits of continued extraction at Argoed Isha is therefore entirely consistent with the basic objectives of national minerals policy: prudent use of finite mineral resources, maintenance of flexibility in supply, and avoidance of circumstances in which sites with genuine future potential are prematurely written off.

12. Restoration, aftercare and biodiversity gain

The respondent’s case is not simply that Argoed Isha should be recognised as a future mineral source. It is also that any future reworking can and should be subject to a modern restoration-led scheme capable of securing environmental gains.

PPW contemplates restoration and aftercare proposals for inactive sites, including natural revegetation for nature conservation and ecological interests. BP25 records that, where necessary, restoration may be sought at dormant sites. The candidate site material also identifies that the site is not close to internationally or nationally important wildlife sites, while noting the presence of existing ecological and geological interests that could be appropriately managed through buffers, mitigation and future planning controls. These are precisely the kinds of circumstances in which a carefully designed extraction and restoration scheme could deliver meaningful biodiversity and geodiversity benefits alongside the prudent working of the remaining mineral resource.

Future working at Argoed Isha should therefore not be viewed in binary opposition to environmental enhancement. The modern policy framework envisages integrated mineral development in which extraction, restoration and aftercare are part of a single coherent process. That is an additional reason why the Plan should positively recognise the site’s continuing potential rather than leaving it in a policy grey area.

13. Overall conclusion

The evidence base points clearly to a more positive and more coherent treatment of Argoed Isha than is presently provided in the Deposit RLDP.

PPW says that landbanks should reflect “real possibilities for future mineral working” and that prohibition orders are appropriate where there is “no prospect of future working”. MTAN1 requires a separate assessment of “dormant reserves” and seeks “A more realistic landbank assessment”. SWRAWP states that “Caution must be exercised in using these landbank figures”. BP25 records that “useable reserves remain at the site and could be extracted if required” and that they “have the potential to be reworked”. The Development Plans Manual requires plans to be based on robust evidence and to be deliverable.

Against that background, the Council’s reliance on the proposition that the RTS2 indicates no further allocations are specifically required does not dispose of the issue. It may explain why there is no immediate need for a fresh mineral allocation, but it does not justify a passive or dismissive treatment of Argoed Isha. The more sound and evidence-based approach is to recognise that, whilst no additional formal allocation is presently required, Argoed Isha remains a dormant limestone quarry with usable reserves and realistic future reactivation potential, capable of coming forward in future under modern policies for sustainable working, restoration and aftercare.

14. Summary

These representations contend that, whilst the Deposit RLDP minerals strategy is broadly supported, the Plan is unsound in part in its treatment of Argoed Isha Quarry. In particular, the objection goes principally to whether the Plan is justified by the evidence and whether it is effective in delivery. The objection also concerns consistency with national minerals policy to the extent that the Deposit RLDP does not fully reflect PPW and MTAN1 in positively planning for the safeguarding and potential future working of this identified limestone resource.

 Strategic Policy SP18 – Minerals Supply and Safeguarding: Support in part / Object in part.

The respondent supports the overarching strategy of maintaining a continuous supply of minerals, safeguarding mineral resources and avoiding sterilisation. However, objection is taken insofar as the strategy does not carry through the Council’s own evidence that Argoed Isha retains usable reserves and future potential for reworking.

 Policy MIN1 – Mineral Safeguarding Areas: Support.

This policy is supported because it reflects national policy by safeguarding limestone resources from permanent development that would sterilise them or hinder future extraction.

That approach is directly relevant to Argoed Isha, which remains a safeguarded resource with extant mineral significance.

 Policy MIN2 – Quarry Buffer Zones: Support.

The principle of protecting mineral operations from encroachment by incompatible development is supported. If Argoed Isha is to remain a realistic future source of limestone, the Plan should continue to avoid prejudice to its potential reactivation.

 Policy MIN3 – Dormant Mineral Sites: Support in principle / Object in part.

The respondent supports the Council’s decision not to serve a Prohibition Order at Argoed Isha. That is plainly the correct approach because BP25 confirms that usable reserves remain and may be reworked. However, objection is taken to the absence of stronger wording recognising that the site remains a realistic future source of limestone.

 Policy MIN4 – Sustainable Mineral Working: Support in principle.

The respondent supports the policy framework for future reworking or reopening of old

workings, including the need for acceptable impacts, restoration and beneficial after-use. Argoed Isha is capable of being assessed under that type of modern policy framework.
 Supporting text to the dormant quarry provisions / paragraph 6.386 equivalent approach: Object in part.
The Plan is correct to recognise that the reserves at Argoed Isha could be reworked in future. The objection is that this conclusion is not carried through into a fuller and more positive policy narrative.
 Plan Period: Object.
Amend in line with the Development Plans Manual such that there are at least 10 years remaining at adoption.
 Candidate Site 411 – Argoed Isha Quarry: Object.
The respondent objects to the candidate site assessment insofar as the site appears to have been rejected solely or mainly because RTS2 indicates that no further allocations are specifically required. That is too narrow an approach and does not properly reflect PPW, MTAN1, SWRAWP or BP25's conclusion that usable reserves remain and may be reworked.
 Minerals Background Paper BP25: Support in part / Object in part.
BP25 is supported where it correctly records that Argoed Isha is dormant, that usable reserves remain, and that the site has the potential to be reworked. Objection is taken only insofar as the Deposit RLDP does not fully reflect the implications of that evidence in a more positive and coherent plan-led position.
 Temporary training use: Clarificatory comment in support of the representation.
The current training use does not sterilise the limestone reserve. BP25 records the temporary training use until 2030 while also confirming that usable reserves remain and that the site may be reworked. It should therefore be treated as an interim use only.
 Benefits of continued extraction at Argoed Isha: Positive material consideration.
Continued extraction at Argoed Isha would make productive use of an existing dormant quarry with remaining usable reserves, support local and sub-regional limestone supply from a Vale source, contribute to flexibility and resilience in the minerals strategy, and enable future working to proceed under modern planning controls with restoration, aftercare and biodiversity enhancement.
 Overall position on the Deposit RLDP minerals strategy: Support in part / Object in part.
In overall terms, the respondent supports the Deposit RLDP's general minerals framework. The objection is a precise and limited one: the Plan should more clearly and positively recognise Argoed Isha as a dormant quarry with usable reserves, realistic reactivation potential, and scope for a future scheme of continued extraction and restoration, such that the Plan is properly justified by its evidence base and effective in delivering a resilient minerals strategy over the plan period.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3j3
Email Representation - https://valeofglamorgan.oc2.uk/a/3j4

7126 Object

Document Element: SP18 - SUSTAINABLE PROVISION OF MINERALS
Respondent: Tom Prichard (Holdings) Ltd [3738]
Agent: Highlight Planning

Summary:

Objection is taken insofar as the strategy does not carry through the Council's own evidence that Argoed Isha retains usable reserves and future potential for reworking.

Full text:

REPRESENTATIONS TO THE DEPOSIT VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036 ON BEHALF OF TOM PRICHARD (HOLDINGS) LTD
1. Introduction
These representations are submitted on behalf of Tom Prichard (Holdings) Ltd in respect of the Deposit Vale of Glamorgan Replacement Local Development Plan 2021–2036. They relate specifically to the Plan's minerals strategy and policy framework, the treatment of dormant mineral sites, and the candidate site assessment and supporting evidence relating to Argoed Isha Quarry, Llansannor.
The respondent supports the broad direction of the Deposit RLDP minerals framework, but contends that the Plan is unsound in part in the way it presently treats Argoed Isha Quarry. The central point is straightforward: the Council's own evidence accepts that usable reserves remain at the site, that those reserves could still be extracted if required, and that the site has the potential to be reworked. Yet that conclusion is not carried through into a sufficiently positive and coherent plan-led position.
The objection is therefore not to the principle of maintaining a minerals strategy founded on

safeguarding, environmental protection and modern control of extraction. Nor is it suggested that the Plan must necessarily allocate Argoed Isha as a new specific site simply because a candidate site was submitted. Rather, the objection is that the Deposit RLDP does not properly reflect the evidential position it has itself reached. It acknowledges that Argoed Isha should not be made subject to a Prohibition Order, but stops short of recognising clearly that the site remains a dormant limestone quarry with continuing mineral significance, realistic future reactivation potential and scope for future working under modern planning controls, restoration obligations and biodiversity enhancement.

2. Site context and planning status

Argoed Isha is a long-established limestone quarry. The candidate site planning statement explains that the site has a historic quarry planning status, that recommencement would require updated working conditions, and that the site was promoted through the candidate site process precisely because there remains interest in recommencing mineral extraction. The same statement records the local planning authority's earlier position that, in relation to a previous proposal, the Council could only seek a Prohibition Order if it was satisfied that resumption of extraction was unlikely, but that "this requirement is not met" at Argoed Isha because of continuing interest in re-opening the quarry. It also records the mineral adviser's view that "The site currently has planning permission for a quarry" and that, absent relinquishment, "the permission to quarry remains valid".

The candidate site material also addresses availability and deliverability. It states that the site is available for development, that the proposal is considered viable and deliverable owing to the underlying need for the mineral, and that the site is a brownfield / underutilised site. It further notes that the proposal comprises mineral development within a mineral safeguarding area and within a site which benefits from a planning permission for quarrying, such that it is considered acceptable in principle. Those points are important because they show that Argoed Isha is not simply a theoretical reserve detached from any realistic prospect of future use.

3. Soundness and the role of evidence

The Development Plans Manual states that plans should be based on robust evidence so they can be delivered and that LPAs must be able to demonstrate, in broad terms, that the plan is deliverable with no significant impediments to implementation. It also emphasises the importance of a detailed candidate site process and of ensuring delivery and viability are embedded in that process from the outset. Elsewhere, the Manual explains that the plan-making process should prepare more effective, efficient and deliverable plans and refers expressly to the tests of soundness which must be satisfied if a development plan is to be recommended for adoption.

Those principles matter here because the Council had before it a candidate site submission which set out the site's planning status, constraints, deliverability and rationale for retention as a mineral site. It also had its own local evidence in BP25 and the wider regional evidence from RTS2, the sub-regional collaboration work and SWRAWP. In those circumstances, a sound plan ought to explain clearly how that evidence has informed the Council's chosen strategy for Argoed Isha. In the respondent's submission, the Deposit RLDP presently falls short because it recognises part of the evidence, but not its full implications. The Plan is therefore unsound in part because it is not fully justified by the evidence and is not as effective as it should be in setting out a coherent future approach to this dormant but still viable mineral resource.

4. National policy context – Planning Policy Wales

Planning Policy Wales establishes the national context for these representations. It requires planning authorities to maintain landbanks for non-energy minerals in demand and states that, for crushed rock, a minimum ten-year landbank should be maintained through the plan period unless agreement is reached for other authorities to make a compensating increase in provision. PPW also recognises that individual authority boundaries are not always an adequate basis for landbank policy where environmental constraints are too important or workable resources too limited, in which case authorities must agree a joint approach with neighbouring authorities in line with regional arrangements.

PPW is especially important in relation to inactive sites. Paragraph 5.14.17 provides that inactive sites with planning permission for future working which are considered unlikely to be reactivated should be identified in the development plan and should be the subject of a suitable strategy, which could include prohibition orders, restoration and aftercare proposals, and a suitable proposed after-use. Paragraph 5.14.18 then states that "It is in the interests of the minerals industry that landbanks reflect real possibilities for future mineral working" and adds that, where sites have been inactive and "there is no prospect of future working", authorities should consider the use of prohibition orders.

That distinction is central to the present case. The Council has not concluded that there is no prospect of future working at Argoed Isha. Quite the contrary: BP25 states that usable reserves remain at the site, that they could be extracted if required, and that they have the potential to be reworked. The logic of PPW is therefore that Argoed Isha is not a site to be treated as effectively closed or exhausted. It remains a site with continuing mineral relevance, albeit one that would require modern conditions and a fresh scheme of workings before any extraction could recommence.

PPW is also directly relevant to areas of future working. Paragraph 5.14.19 states that "Where necessary, planning authorities should provide a clear guide to where non-energy mineral extraction is likely to be acceptable" and that policies and proposals should cover mineral resources "which are currently used or which may need to be used in the foreseeable future". It further explains that such areas should be clearly identified on a proposals map and may take the form, in order of preference,

of specific sites, preferred areas or areas of search.
The respondent does not suggest that PPW compels the Council to identify Argoed Isha as a specific site. However, PPW plainly supports a more positive and more explicit plan-led recognition of sites which retain real future mineral potential. Once the Council's own evidence accepts that Argoed Isha is such a site, it is difficult to reconcile a largely passive policy response with the national expectation that development plans should give a clear guide to where future mineral working may be acceptable.
5. National policy context – MTAN1
MTAN1 reinforces the need for a realistic and evidence-based approach to landbanks and dormant sites. It explains that a landbank is composed of permitted reserves at active and inactive sites, and that development plans should include an assessment of both the current and future landbank. Paragraph 47 then states that development plans should identify those sites that are dormant and count these as "dormant reserves" to be clearly shown in landbank calculations as a separate category. Paragraph 48 continues by stating that a more realistic approach is required, observing that extensive historic landbanks can perpetuate unsustainable supply patterns if left unaltered. MTAN1 therefore states that "A more realistic landbank assessment is the aim of this process" so that a more accurate picture is obtained of permitted reserves "that are likely to have real potential for future working".
That policy language is highly material. It confirms that dormant reserves are not irrelevant simply because they are not counted within the active landbank. They are to be identified separately and realistically assessed. That is precisely the position that should be taken with Argoed Isha. The Council has already undertaken the essential assessment in substance through BP25 and has concluded that usable reserves remain and that the site has the potential to be reworked. MTAN1 therefore supports a more nuanced and more positive treatment of the site than a simple "no allocation required" conclusion.
MTAN1 also recognises that in some authorities it may not be possible or acceptable to provide an adequate current or extended landbank because of environmental designations, limited suitable resources, or amenity considerations, and that RAWPs should consider the environmental capacity of authorities to supply aggregates. This is an important reminder that reserve arithmetic is not the only issue. Deliverability, environmental capacity, and the practical availability of reserves remain relevant.
6. Apportionment and Plan Period
The regional and sub-regional evidence does not undermine the respondent's case. It explains why there is no present quantitative requirement for a further minerals allocation in the Vale, but it does not justify a negative or dismissive treatment of Argoed Isha.
BP25 records the RTS2 and Statement of Sub-Regional Collaboration position for the Cardiff City subregion. Table 5 identifies the Vale of Glamorgan apportionment for crushed rock as 17.05 million tonnes over 25 years, with existing permitted reserves of 18.73 million tonnes at the end of 2016 and a minimum allocation needed of 0, alongside 13 million tonnes of additional reserves at dormant sites. BP25 then states that, based on those figures, the SSRC identifies that the Vale of Glamorgan does not require any allocations for future workings of crushed rock to be identified within the RLDP.
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated review of mineral reserves) would therefore ensure a sound plan.
Notwithstanding our comment in respect of the Plan Period, we remain concerned of how the Plan should treat a dormant site which the Council accepts has remaining usable reserves and realistic reactivation potential. Nor does it justify treating Argoed Isha as though it lacked future significance.
The respondent's case is therefore not that the RTS2 figure is wrong, but that it has been taken too far. A conclusion that no additional formal allocation is presently required is not the same thing as a conclusion that the site has no future role.
7. BP25 – the Council's own minerals evidence
BP25 is the most important local evidence document for present purposes. It records that the Vale of Glamorgan is an "important supplier of Carboniferous limestone for general aggregate use". It then addresses dormant mineral sites in the Vale. Paragraphs 5.48 to 5.50 explain that many dormant sites have not been worked for many years and are considered unlikely to be worked in the future; accordingly, the Council intends to serve Prohibition Orders on those sites, which would provide certainty for nearby residents and remove reserves which are not realistically available. BP25 also explains that the level of reserves at dormant sites is not counted in the landbank.
Crucially, BP25 then distinguishes Argoed Isha from that general class of dormant sites. Paragraph 5.51 states: "While Argoed Isha quarry is classified as 'dormant', useable reserves remain at the site and could be extracted if required." It goes on to record that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030, but then

adds: “While the reserves at the site are not included in the current landbank, they have the potential to be reworked and therefore a Prohibition Order will not be served at Argoed Isha Quarry until the current circumstances change.”
That is a very clear evidential conclusion. BP25 does not simply refrain from prohibiting the site without explanation. It positively explains why Argoed Isha is different: usable reserves remain, they could be extracted if required, and they have the potential to be reworked. In the respondent’s submission, that conclusion requires a correspondingly clearer and more positive policy response within the Deposit RLDP than is presently provided.
BP25 is also supportive on restoration and aftercare. It states that the serving of Prohibition Orders is intended to provide certainty and, where necessary, restoration of sites may be sought. More broadly, the background paper recognises the importance of sustainable minerals management and balancing mineral extraction with environmental protection and community well-being. That policy background is entirely consistent with the respondent’s case that any future working at Argoed Isha should be controlled through a modern framework of environmental safeguards and restoration-led after-use.
8. SWRAWP Annual Report 2024
The SWRAWP Annual Report 2024 is also highly relevant because it warns against over-reliance on headline landbank figures. Paragraph 4.10 states that “Caution must be exercised in using these landbank figures” because the calculation does not take account of geographical or operational aspects that may restrict the availability of certain reserves, nor constraints arising from changes in planning policy, protected site designation or other non-planning permitting requirements. Paragraph 4.11 then confirms that dormant sites have not been included in landbank calculations and that local planning authorities should carry out their own assessments of the likelihood of reactivation, but that in any event “dormant reserves must be counted separately”.
That evidence materially supports the respondent’s case. It shows that the statement “no further allocations are specifically required” is not, in itself, the end of the analysis. Landbank figures are a starting point, but they do not tell the whole story. Questions of practical availability, regulatory and environmental constraints elsewhere, and the separate role of dormant reserves remain relevant. Argoed Isha therefore retains importance as part of the broader mineral resource picture even though it is not part of the active landbank.
9. Response to the Council’s candidate site assessment
The Council’s candidate site assessment records that a positive allocation for mineral working is not included because “the 2nd Review of the Minerals Regional Technical Statement indicates no further allocations are specifically required to be identified within the Vale of Glamorgan RLDP”. That point should be addressed directly.
The respondent accepts that the RTS2 position explains why the Council may have concluded that there is no immediate need for a fresh mineral allocation in quantitative terms. However, that is not a sufficient reason, on its own, to reject a more positive policy treatment of Argoed Isha or to give the impression that the site lacks future significance. BP25 itself shows why. It records both that the Vale does not presently require additional allocations and, separately, that Argoed Isha retains remaining usable reserves and has the potential to be reworked. Those two propositions are not inconsistent. They point toward a more nuanced and more accurate conclusion: namely, that Argoed Isha may not need to be allocated now to meet a current numerical shortfall, but it remains a dormant limestone
reserve of continuing strategic relevance that should be positively recognised within the Plan.
That approach is also supported by PPW, MTAN1 and SWRAWP. PPW states that landbanks should reflect “real possibilities for future mineral working” and that prohibition orders are appropriate where there is “no prospect of future working”. MTAN1 requires dormant reserves to be separately identified and assessed so as to achieve “A more realistic landbank assessment”. SWRAWP says that “Caution must be exercised” in using landbank figures and that dormant reserves must be counted separately. Those documents all point to a need for a broader planning judgment than simple reserve arithmetic. Accordingly, the flaw in the candidate site reasoning is not that it refers to the RTS2 position, but that it appears to stop there. In the respondent’s submission, the sounder and more evidence-based approach would have been either to give the site more positive recognition in the Plan’s supporting text, or at the very least to make clear that the site was not allocated because no immediate additional allocation was required, not because the site lacked merit, availability or future potential.
Moreover, SWRAWP reinforces the point that reserve arithmetic is not the whole picture. It states that “Caution must be exercised in using these landbank figures” because the calculation does not take account of geographical or operational aspects, changes in planning policy, protected site designations or other permitting constraints. This is particularly relevant given the increasingly important role of NRW licensing and abstraction controls, including quarry dewatering considerations, which may mean that some reserves are no longer as readily available or economically viable as historic landbank figures imply. Accordingly, apparent reserve sufficiency in quantitative terms may overstate the extent of genuinely deliverable supply.
10. The existing temporary training permission does not sterilise the reserve
BP25 states that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030. The significance of that point is not that the site has permanently moved away from minerals. The significance is the opposite: BP25 records the temporary training use while simultaneously concluding that usable reserves remain and may be reworked, and

that a Prohibition Order should therefore not be served.
In planning terms, a temporary training use of this kind cannot properly be treated as sterilising the mineral reserve. PPW's safeguarding policy is concerned with preventing sterilisation by permanent development. A time-limited interim use, particularly one expressly acknowledged in BP25 as coexisting with a potentially reworkable reserve, does not extinguish the underlying mineral significance of the site. The temporary training use should therefore be understood as an interim overlay rather than a permanent change in land use character.
11. Benefits of continued extraction at Argoed Isha Quarry
Continued extraction at Argoed Isha Quarry would give rise to a number of site-specific and strategic benefits which the Deposit RLDP should recognise when considering the future role of the site.
The site is not a greenfield mineral proposal on an entirely undeveloped site. It is an existing quarry with a long-established mineral planning history and extant mineral status in principle, subject to updated modern conditions. The principle of mineral working at the site is therefore already established in land use terms, and the future reworking of the reserve would represent the continuation of an existing mineral use rather than the introduction of quarrying into a wholly new location. That is a material distinction when considering the appropriateness of retaining the site as a realistic future mineral resource.
Continued extraction would also assist in making use of a proven local limestone resource in the Vale of Glamorgan, rather than forcing greater reliance on more distant or more constrained sources. BP25 confirms that the Vale is an "important supplier of Carboniferous limestone for general aggregate use". In practical terms, continued extraction at Argoed Isha would accord with the proximity principle by helping to meet demand from a comparatively well-located source close to markets in the Vale and wider Cardiff area, rather than depending unduly on more remote sources or on supply patterns that may become more constrained over time.
The site would also contribute to the resilience and flexibility of the wider minerals supply position. Even if no immediate additional allocation is numerically required under RTS2, national and regional policy make clear that landbank figures are not the only relevant consideration. A dormant quarry with remaining usable reserves provides contingency, flexibility and productive capacity in the event that supply circumstances change during the plan period. This is especially important where SWRAWP warns that landbank figures do not capture geographical, operational, policy or other permitting constraints, and where MTAN1 requires a realistic view of reserves with future potential. Argoed Isha therefore has value not merely as a theoretical reserve, but as part of a resilient longer-term supply position.
Continued extraction at Argoed Isha would also support local supply chains and a more diverse quarrying sector. The candidate site submission identified the benefit of maintaining provision from a range of operators, including smaller and medium-sized businesses, rather than relying only on a limited number of larger established sites. In planning terms, that diversity is relevant to continuity of supply, competition, responsiveness to local demand and the overall resilience of the minerals sector in the Vale and wider region.
A further benefit is that any future extraction would be carried out under modern planning control rather than being left sterilised or underused. If the site is reworked in future, that would necessarily be through a fresh scheme of modern conditions and under the policy framework of the RLDP and national minerals policy. Issues such as traffic, hydrology, hydrogeology, ecology, landscape, amenity, blasting, dust, restoration and long-term aftercare would all be capable of being addressed through a contemporary planning and environmental control regime. That is an important benefit in itself, because it means any future extraction would not take place under outdated historic controls, but under a modern framework designed to secure sustainable mineral working.
Continued extraction would also create the opportunity for a comprehensive restoration and aftercare strategy delivering environmental gains. PPW recognises that restoration and aftercare proposals for inactive sites may include natural re-vegetation for nature conservation and ecological interests. BP25 records that restoration may be sought where necessary. In practice, any future extraction proposal at Argoed Isha could be accompanied by a restoration-led scheme involving landform improvement, habitat creation, ecological enhancement and long-term stewardship. The site should therefore not be seen simply as a mineral reserve, but as a place where carefully managed extraction could unlock biodiversity, landscape and geodiversity benefits over time.
The site also represents the productive use of an underutilised brownfield quarry. The candidate site material identifies it as a brownfield / underutilised site. In land use terms, there is a clear logic in making effective use of an existing quarried landscape with established mineral status, rather than placing additional pressure on wholly undeveloped land elsewhere. In this case, the Council's own evidence confirms the key factor: usable reserves remain and the site has the potential to be reworked.
There is finally a longer-term safeguarding benefit in recognising the case for continued extraction. PPW requires mineral resources to be safeguarded to prevent sterilisation by permanent development, and makes clear that landbanks should reflect "real possibilities for future mineral working". Positive recognition of the benefits of continued extraction at Argoed Isha is therefore entirely consistent with the basic objectives of national minerals policy: prudent use of finite mineral resources, maintenance of flexibility in supply, and avoidance of circumstances in which sites with genuine future potential are prematurely written off.

12. Restoration, aftercare and biodiversity gain
The respondent's case is not simply that Argoed Isha should be recognised as a future mineral source. It is also that any future reworking can and should be subject to a modern restoration-led scheme capable of securing environmental gains.
PPW contemplates restoration and aftercare proposals for inactive sites, including natural revegetation for nature conservation and ecological interests. BP25 records that, where necessary, restoration may be sought at dormant sites. The candidate site material also identifies that the site is not close to internationally or nationally important wildlife sites, while noting the presence of existing ecological and geological interests that could be appropriately managed through buffers, mitigation and future planning controls. These are precisely the kinds of circumstances in which a carefully designed extraction and restoration scheme could deliver meaningful biodiversity and geodiversity benefits alongside the prudent working of the remaining mineral resource.
Future working at Argoed Isha should therefore not be viewed in binary opposition to environmental enhancement. The modern policy framework envisages integrated mineral development in which extraction, restoration and aftercare are part of a single coherent process. That is an additional reason why the Plan should positively recognise the site's continuing potential rather than leaving it in a policy grey area.
13. Overall conclusion
The evidence base points clearly to a more positive and more coherent treatment of Argoed Isha than is presently provided in the Deposit RLDP.
PPW says that landbanks should reflect "real possibilities for future mineral working" and that prohibition orders are appropriate where there is "no prospect of future working". MTAN1 requires a separate assessment of "dormant reserves" and seeks "A more realistic landbank assessment". SWRAWP states that "Caution must be exercised in using these landbank figures". BP25 records that "useable reserves remain at the site and could be extracted if required" and that they "have the potential to be reworked". The Development Plans Manual requires plans to be based on robust evidence and to be deliverable.
Against that background, the Council's reliance on the proposition that the RTS2 indicates no further allocations are specifically required does not dispose of the issue. It may explain why there is no immediate need for a fresh mineral allocation, but it does not justify a passive or dismissive treatment of Argoed Isha. The more sound and evidence-based approach is to recognise that, whilst no additional formal allocation is presently required, Argoed Isha remains a dormant limestone quarry with usable reserves and realistic future reactivation potential, capable of coming forward in future under modern policies for sustainable working, restoration and aftercare.
14. Summary
These representations contend that, whilst the Deposit RLDP minerals strategy is broadly supported, the Plan is unsound in part in its treatment of Argoed Isha Quarry. In particular, the objection goes principally to whether the Plan is justified by the evidence and whether it is effective in delivery. The objection also concerns consistency with national minerals policy to the extent that the Deposit RLDP does not fully reflect PPW and MTAN1 in positively planning for the safeguarding and potential future working of this identified limestone resource.
 Strategic Policy SP18 – Minerals Supply and Safeguarding: Support in part / Object in part.
The respondent supports the overarching strategy of maintaining a continuous supply of minerals, safeguarding mineral resources and avoiding sterilisation. However, objection is taken insofar as the strategy does not carry through the Council's own evidence that Argoed Isha retains usable reserves and future potential for reworking.
 Policy MIN1 – Mineral Safeguarding Areas: Support.
This policy is supported because it reflects national policy by safeguarding limestone resources from permanent development that would sterilise them or hinder future extraction.
That approach is directly relevant to Argoed Isha, which remains a safeguarded resource with extant mineral significance.
 Policy MIN2 – Quarry Buffer Zones: Support.
The principle of protecting mineral operations from encroachment by incompatible development is supported. If Argoed Isha is to remain a realistic future source of limestone, the Plan should continue to avoid prejudice to its potential reactivation.
 Policy MIN3 – Dormant Mineral Sites: Support in principle / Object in part.
The respondent supports the Council's decision not to serve a Prohibition Order at Argoed Isha. That is plainly the correct approach because BP25 confirms that usable reserves remain and may be reworked. However, objection is taken to the absence of stronger wording recognising that the site remains a realistic future source of limestone.
 Policy MIN4 – Sustainable Mineral Working: Support in principle.
The respondent supports the policy framework for future reworking or reopening of old workings, including the need for acceptable impacts, restoration and beneficial after-use. Argoed Isha is capable of being assessed under that type of modern policy framework.
 Supporting text to the dormant quarry provisions / paragraph 6.386 equivalent approach: Object in part.
The Plan is correct to recognise that the reserves at Argoed Isha could be reworked in future. The objection is that this conclusion is not carried through into a fuller and more positive

policy narrative.
 Plan Period: Object.
Amend in line with the Development Plans Manual such that there are at least 10 years remaining at adoption.
 Candidate Site 411 – Argoed Isha Quarry: Object.
The respondent objects to the candidate site assessment insofar as the site appears to have been rejected solely or mainly because RTS2 indicates that no further allocations are specifically required. That is too narrow an approach and does not properly reflect PPW, MTAN1, SWRAWP or BP25's conclusion that usable reserves remain and may be reworked.
 Minerals Background Paper BP25: Support in part / Object in part.
BP25 is supported where it correctly records that Argoed Isha is dormant, that usable reserves remain, and that the site has the potential to be reworked. Objection is taken only insofar as the Deposit RLDP does not fully reflect the implications of that evidence in a more positive and coherent plan-led position.
 Temporary training use: Clarificatory comment in support of the representation.
The current training use does not sterilise the limestone reserve. BP25 records the temporary training use until 2030 while also confirming that usable reserves remain and that the site may be reworked. It should therefore be treated as an interim use only.
 Benefits of continued extraction at Argoed Isha: Positive material consideration.
Continued extraction at Argoed Isha would make productive use of an existing dormant quarry with remaining usable reserves, support local and sub-regional limestone supply from a Vale source, contribute to flexibility and resilience in the minerals strategy, and enable future working to proceed under modern planning controls with restoration, aftercare and biodiversity enhancement.
 Overall position on the Deposit RLDP minerals strategy: Support in part / Object in part.
In overall terms, the respondent supports the Deposit RLDP's general minerals framework.
The objection is a precise and limited one: the Plan should more clearly and positively recognise Argoed Isha as a dormant quarry with usable reserves, realistic reactivation
potential, and scope for a future scheme of continued extraction and restoration, such that the Plan is properly justified by its evidence base and effective in delivering a resilient minerals strategy over the plan period.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3j3
Email Representation - https://valeofglamorgan.oc2.uk/a/3j4

6812 Comment

Document Element: MIN1 - DEVELOPMENT IN MINERALS SAFEGUARDING AREAS

Respondent: Mineral Products Association (Mr Peter Nicholas Horsley, Planning Director) [689]

Summary:

Whilst we support the principle of the policy, we suggest the addition of a further subsection addressing the scope for prior extraction. PPW (5.14.7) states "the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered."

Add a further subsection to address the principle of prior extraction.

Full text:

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and industrial sand industries. MPA is the sectoral voice for mineral products, covering 100% of UK cement and lime production, 90% of GB aggregates production, 95% of asphalt and over 60% of ready-mixed concrete and precast concrete production. In 2023, the industry supplied £18.4 billion worth of materials and services to the Economy, directly generating £6.7 billion in Gross Value Added (GVA). It is the largest supplier to the construction industry, which generated £141.5 billion in GVA in 2023. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting us on the above document. Mineral supply will be critical to delivering many of the objectives identified in the preferred strategy as well as many of the national infrastructure project proposed such as floating offshore wind in the Celtic Sea. We have major concerns over the reliance on outdated reserve information and the evidence base must reflect up to date reserve and sales statistics, together with projected demand for major developments.

It is disappointing that despite previous representations in 2022 & 2024, the points highlighted have not been addressed. We have therefore, reiterated our concerns below. We have also suggested alternative wording where appropriate.

We welcome further engagement on this matter to address the concerns.

2.50 Regional Technical Statement for Aggregates (2020) Second Review
We support the reference to the RTS (2nd Review), however, as the authority should be aware, WG has commission a further review (RTS3) which is expected to be published at the end of 2026/early 2027
Note the comment as this will be a material consideration as the plan progresses.

5.35 Barry Docks – ABP Masterplan.
Support - We note ABP's potential for rare earth processing at the Black Rocks Growth Zone and would support such a proposal.
No further comment

SP17 SUSTAINABLE WASTE MANAGEMENT
Support - We note the proposals to facilitate sustainable waste management facilities on …. operational or non-operational mineral working sites and would support this.
No further comment

SP18 Sustainable Provision of Minerals
The local and regional need for the provision of a continuous supply of minerals will be achieved through:
1 Maintaining a minimum of 10 years land bank of crushed rock throughout the plan period.
2 Favouring proposals which promote the sustainable use of minerals and encourage the use of secondary and alternative resources.
3 The safeguarding of known resources of sandstone, limestone, sand and gravel (where these occur outside settlements), from permanent development that would unnecessarily sterilise them or hinder their future extraction; and
4 Safeguarding railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate.
Object - Whilst we can support various elements in the proposed policy, we have concerns over the specific wording in it and the supporting text.
Most notably, subsection 2 does not accord with the PPW (5.11.4) in relation to the use of secondary and RECYCLED materials. It is not clear what is meant by "ALTERNATIVE RESOURCES". This should be replaced. Secondly, PPW "PROMOTES THE USE" and does not reference "favouring proposals. Accordingly, the wording should be amended to reflect PPW
Also, in relation to subsection 4, the proposed policy does not seek to apply safeguarding to minerals infrastructure as is required by PPW (5.14.7 & 5.24.8). Minerals infrastructure is more than just transportation hubs, it includes the wider processing facilities. Subsection 4 should therefore be amended.
The Policy should be amended to read -
"2 (~Favouring proposals which~) Promote the sustainable use of minerals and encourage the use of secondary and RECYCLED MATERIALS. (~alternative resources~)."
"4 Safeguarding EXISTING AND PLANNED INFRASTRUCTURE, INCLUDING railheads to allow for the potential

transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, TOGETHER WITH WIDER MINERALS PROCESSING INFRASTRUCTURE.
6.373 This paragraph states “The 2nd Review of the Minerals Regional Technical Statement for the South Wales area, commonly referred to as RTS2, was published by the South Wales Regional Aggregates Working Party (SWRAWP) in September 2020. Appendix B of the RTS includes specific recommendations and guidance for each Local Planning Authority.”
While this statement is factual, we suggest an additional sentence to reflect that Welsh Government has commission a further review of the Regional Technical Statement (RTS3) which has already commenced and is scheduled for completion by the end of 2026.
Add additional sentence to reflect RTS3.

6.374 This paragraph states
“In November 2021, the Welsh Government’s Chief Planning Officer issued a Policy Clarification letter to rectify an arithmetical error within the RTS2. The clarification letter indicated that the apportionment for the Vale of Glamorgan is 17.05 million tonnes of crushed rock over 25 years. There is an existing landbank of 18.73 million tonnes of crushed rock (as of 31st December 2016), all of which relates to Carboniferous Limestone. There is no apportionment and no land bank for land-won sand and gravel.”
We have significant concerns that the evidence base for the local plan has not been updated. Whilst RTS2 is undoubtedly material, the statement that “There is an existing landbank of 18.73 million tonnes of crushed rock” is not correct. As stated in the text, this is the landbank as of 31st December 2016. The Council must update its evidence base and provide a landbank figure which reflects the current permitted reserves.
Since the publication of the RTS2, there have been numerous publications to assist in updating the evidence base including the SWRAWP reports and AM2023.
In our responses to earlier iterations and consultations on the RLDP we highlighted the need for the Council to update the reserve figures. We also highlighted that planning submissions had indicated that circa 16.5mt of permitted reserve is suitable for non-aggregate use.
It is not clear if this tonnage is included in the 18.73mt referred too.
Greater clarity and analysis is required.

6.374 The wording also states “The report concludes that in view of the slight surplus of existing permitted crushed rock reserves and the lack of sand and gravel production in the Vale of Glamorgan, no further allocations are specifically required to be identified within the RLDP.”
The “slight surplus” referred to was the position at 31st December 2016. The reserve figure needs to be updated.
Update the reserve figures to allow an accurate landbank tobe determined and the need for future allocations to be properly assessed. This should separate out projected aggregate and non-aggregate reserves to ensure clarity.

6.375 The wording states “The RTS2 requires Statements of Sub-regional Collaboration (SSRC) to be prepared by all constituent LPAs within each RTS sub-region. The Vale of Glamorgan along with Bridgend, Cardiff, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly and the Brecon Beacons National Park forms part of the Cardiff City subregion. The latest position statement for this sub-region (July 2022) indicates that while most authorities in the region, including the Vale of Glamorgan, can meet their apportionment for crushed rock, there is a shortfall of 7.475 million tonnes (Mt) within Cardiff that would require an additional RLDP allocation.”
Whilst the position statement referred to may suggest that the apportionment can be adequately met, as highlighted above, there are major concerns that the evidence base being relied upon is out of date. Further, Annex A of the RTS requires that “The LPAs involved should demonstrate, as far as possible, that the SSRC has been produced in consultation with relevant stakeholders, including the Regional Aggregate Working Party (RAWP), as part of the LDP process.” This has not been done and as such the SSRC process adopted is fundamentally flawed.
As clearly stated in our previous representations, there are major concerns over the evidence base and the process of relying upon an SSRC which has not followed the requisite protocol.

MIN1 Development in Minerals Safeguarding Areas
Whilst we support the principle of the policy, we suggest the addition of a further subsection addressing the scope for prior extraction. PPW (5.14.7) states “the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered.”
Add a further subsection to address the principle of prior extraction.

MIN2 Quarry Buffer Zones
This policy states “Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or
(~2 The proposal is located within an existing built-up area which already encroaches into the buffer zone.”~)
Object - Proposed subsection 2 is not an exception to the national buffer zone policy PPW (5.14.44) and should therefore be deleted.
Delete Subsection 2 “Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or”
2 The proposal is located within an existing built-up area which already encroaches into the buffer zone.”

MIN4 Sustainable Mineral Working.
This policy states
“Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will only be permitted where there is a proven national, regional or local need for the mineral and where:”
Object - This policy wording does not reflect PPW (5.11) which seeks to “promote” and not “prioritise” the use of recycled material and secondary aggregates.
Further the word “only” is superfluous and should be deleted.
Reword the policy
“Proposals which PROMOTE (~prioritise~) the use of recycled material and secondary aggregates AS AN ALTERNATIVE TO (~before new sources of~) primary materials (~are developed~) will be SUPPORTED (~favoured~) where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will (~only~) be permitted where there is a proven national, regional or local need for the mineral and where:”

6.388 The wording states “In view of the current landbank of reserves with planning permission at existing mineral working sites within the Vale of Glamorgan, there is no requirement for the Plan to allocate additional areas for limestone extraction.”
As stated above, the Evidence Base has not been updated to provide a true representation of the landbank. The permitted reserves being quoted date from 2016 and cannot provide a sound platform upon which mineral provision or requirements can be determined.
Update the evidence as required.

6.389 The wording states “Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured. The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore, the extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (MTAN1 Paragraph 34).” As stated above, the PPW seeks to promote the use of secondary and recycled aggregates. The council has not provided any evidence that secondary and recycled materials are not being maximised, or that primary materials are being used instead of secondary material. There is simply no evidence of “overprovision”. Further this is a misquote of MTAN1 Paragraph 34.
Amend the text accordingly.
Reword the text “Proposals which (~prioritise~) PROMOTE the use of recycled material and secondary aggregates (~before new sources of~) AS AN ALTERNATIVE TO primary materials (~are developed~) will be SUPPORTED (~favoured~). (~The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore~), The extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (~(MTAN1 Paragraph 34)~)

Change suggested by respondent:

We suggest the addition of a further subsection addressing the scope for prior extraction. PPW (5.14.7) states “the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered.”

Add a further subsection to address the principle of prior extraction.

Sound: Not specified

Attachments:

Redacted Email Representation - https://valeofglamorgan.oc2.uk/a/3hn

6923 Object

Document Element: MIN1 - DEVELOPMENT IN MINERALS SAFEGUARDING AREAS
Respondent: Barratt Redrow Homes [2669]
Agent: Boyer Planning

Summary:

Barratt Redrow understand the need for a sustainable provision of minerals however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource.

A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy.

The presence of the mineral resource does not preclude
the allocation and development of the site as any extraction does not accord with the criteria requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.

Full text:

1. INTRODUCTION

1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.

1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:

• Section 3 – The Vale of Glamorgan Key Characteristics;
• Section 4 – RLDP Key Themes, Vision, and Objectives;
• Section 5 – Sustainable Growth Strategy; and
• Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.

1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):

• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS

Settlement Pattern

2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.

2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".

2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

Housing Need

2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.

2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.

2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.

3. RLDP KEY THEMES, VISION, AND OBJECTIVES

3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.

Key Themes

3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing

population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY
Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.

4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable

location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
5.10 For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
5.11 More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
5.12 Whilst Barratt Redrow appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range, having reviewed the Deposit Plan evidence base Barratt Redrow believe a minimum allowance of 15%

would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.

5.13 In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

5.14 Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).

5.15 In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

5.16 In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need. Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036) and therefore is made up of

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.

5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.

5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.

5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.

5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a

higher level of growth could not also achieve these principles.
5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.
5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.
5.27 In summary, Barratt Redrow acknowledge the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
5.28 These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance and additional site allocations, such as Swn Y Coed, Wenvoe, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
5.29 Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.
5.30 Accordingly, despite Wenvoe being identified as a primary settlement, Policy SP2 notes that development in this location will be limited to 'the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.' Similarly, it is noted that Policy SP2 does not consider Wenvoe to be an appropriate location for ''substantial additional growth''.
5.31 Barratt Redrow object to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified.
5.32 First of all, the Deposit Plan acknowledges that it performs a similar function to the Primary Settlements located within the Strategic Growth Area and it is described as one of the 'sustainable communities' in The Vale of Glamorgan Key Characteristics section, as noted previously in Section 3.
5.33 Likewise, the site benefits from excellent accessibility the local public transport network, active travel routes and local services. These characteristics fully accord with Welsh Government's strategic objectives and emphasise the fact that Swn Y Coed constitutes an appropriate location for future housing.
5.34 With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge''. Barratt Redrow do not consider this to be sufficient justification to discount the site from allocation as there would be limited impact on BMW agricultural land arising from the development of Swn Y Coed.

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available.
5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.
Policy SP4 - Placemaking
5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.
5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.
5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.
5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.
5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
Policy PGD1 – Creating Well Designed and Inclusive Places

5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing

industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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Unsustainable Location & Poor Connectivity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.
• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.

• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.
• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.
• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.
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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
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• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply
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• HG1 (8) St Athan - Clive Road, St Athan

Policy HG3 – Housing Led Redevelopment Opportunity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.

• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).
• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4).Finally, the Council's own Viability Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.
• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could

unnecessarily require variations via Section 73 or Non Material Amendment applications.
• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:
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Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:
i. Space heating demand less than or equal to 40kWh/m2/year;
ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.
• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
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Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the

submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established ‘defensible’ limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be ‘largely shielded from view by woodland blocks/strips’.
• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for ‘infilling’ the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.
• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
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Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute

"visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
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Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.
• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
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MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
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• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
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Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.

• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
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CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the Council's vision for the VoG.
• 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
• 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
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6. CONCLUSION
• Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.
• Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swn Y Coed, are necessary to ensure the RLDP is able to effectively meet
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Barratt Redrow welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Barratt Redrow support the requirements for affordable housing in new development. In its current form the proposed policies SP7 and SP8 lack sufficient flexibility for site specific circumstances and physical constraints which may impact upon delivery. This inevitably creates uncertainty for a number of sites, where the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities.
• From a planning perspective it is also important to recognise the additional benefits the site (Candidate Site Ref No. 437) could provide in accommodating the increased housing need generated by the suggested 15% flexibility allowance within a highly sustainable location. The principles of which clearly align with the Council's aspirations and would maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport

Change suggested by respondent:

The site at Swn Y Coed should be removed from the safeguarding area.

Sound: Not specified

Attachments:
Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3ch

7121 Support

Document Element: MIN1 - DEVELOPMENT IN MINERALS SAFEGUARDING AREAS
Respondent: Seth Hill & Son Ltd [1197]
Agent: Highlight Planning

Summary:
Support is given to the safeguarding of limestone resources from unnecessary sterilisation.

Full text:
REPRESENTATIONS TO THE DEPOSIT VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036 ON BEHALF OF SETH HILL AND SON LTD

1. Introduction

These representations are submitted on behalf of Seth Hill & Son Ltd in response to the Deposit Vale of Glamorgan Replacement Local Development Plan 2021–2036.

They relate specifically to the treatment of Pant-y-Ffynnon Quarry / Seth Hill Quarry, Bonvilston in the Deposit Plan and the associated candidate site assessment process.

The principal concern arises from the Council's candidate site assessment, which states that a positive allocation for mineral working is not included because "The 2nd Review of the Minerals Regional Technical Statement indicates no further allocations are specifically required to be identified within the Vale of Glamorgan RLDP."

That explanation addresses only the narrow issue of whether a fresh minerals allocation is presently required on RTS2 arithmetic. It does not adequately address the planning merits of Pant-y-Ffynnon Quarry itself, nor does it justify a limited or negative treatment of the site in the Deposit RLDP.

These representations therefore object to the overly narrow basis on which the site appears to have been discounted for positive recognition and seek a more balanced and evidence-based treatment of Pant-y-Ffynnon Quarry within the Plan.

2. Site context

Pant-y-Ffynnon Quarry is an established quarrying location with an existing mineral planning history and an established role within the local minerals framework.

The candidate site planning statement explains that the site comprises the full extent of the currently consented Ffynnon Quarry, together with adjoining land to the south. It confirms that the quarry extracts limestone and that the consented quarry element is identified in the adopted LDP as a Quarry Site, with adjoining land within the Buffer Zone and wider Mineral Safeguarding Area. The submission sought to retain the existing LDP status of the consented element and to safeguard the potential for further quarrying to take place on the remainder of the site in the longer term.

The candidate site statement also recorded the continuing active planning context at the site, including application ref. 2021/01379/FUL for the resumption of limestone extraction in the North Quarry, the establishment of an aggregates recycling facility, and restoration of the North Quarry using inert waste materials. That position has since been materially reinforced by the ROMP determination.

Decision notice 2024/00246/ENV is a Determination of New Working Conditions for Pantyffynnon Quarry / Seth Hill Quarry, Bonvilston. The decision provides that the new conditions replace those attached to permissions 97/01084/FUL and 2009/00184/ENV. Condition 1 states that "No operations authorised by this permission, with the exception of restoration and after-treatment works approved under these conditions shall take place after 21 February 2042." The decision also requires a detailed working scheme, revised working programmes every five years, and imposes an annual production limit of 250,000 tonnes.

BP25 independently corroborates the continuing active status of the quarry. It identifies Pantyffynnon in Table 1 as an active quarry with an extraction end date of 21.02.2042. BP25 also confirms that the Vale of Glamorgan is an "important supplier of Carboniferous limestone for general aggregate use".

Taken together, that evidence confirms that the site is not simply a historic quarry with uncertain prospects. It is an active quarry with a recently updated modern conditions framework and an extraction end date beyond the RLDP period.

3. Objection to the candidate site assessment

The Council's candidate site assessment relies on the proposition that no further allocations are specifically required because of the RTS2 position. That reasoning is too narrow.

The statement that no further allocations are specifically required may explain why the Council has concluded that it does not presently need to identify a fresh minerals allocation in order to meet the current quantitative apportionment. It does not, however, address the separate issue of how the Plan should treat an existing quarry site such as Pant-y-Ffynnon Quarry.

The absence of a current need for a new allocation is not the same as a conclusion that an established quarry site should cease to be positively recognised, should no longer be meaningfully safeguarded, or should be treated as strategically unimportant.

The candidate site submission itself demonstrates why the Council's reasoning is incomplete. The

submission did not merely seek a fresh allocation on the basis of additional tonnage need. It sought retention of the existing quarry status of the consented element and safeguarding of the wider site for longer-term quarrying potential.

The ROMP decision strengthens that point considerably. A site that has recently been granted updated mineral working conditions and is authorised to continue operations until 21 February 2042 cannot sensibly be treated as though its future role is immaterial simply because current RTS2 figures do not require a further allocation elsewhere in the Vale.

The Council's approach is also difficult to reconcile with national plan-making guidance. The Development Plans Manual states that plans should be based on "robust evidence" so they can be delivered, that candidate sites should not be purposefully excluded from assessment, and that the key objective is whether a promoter has a serious intention to bring the site forward, which links directly to the soundness question "Will the plan deliver?"

In those circumstances, the candidate site assessment appears to conflate two distinct questions: whether a new specific allocation is numerically required under RTS2, and whether an established quarry site should continue to be positively recognised and safeguarded in the Plan. Those questions are not the same. The former may currently be answered in the negative. The latter, in the case of Pant-y-Ffynnon Quarry, should plainly be answered in the affirmative.

4. National and local policy context

The wider policy and evidence framework supports a more positive treatment of Pant-y-Ffynnon Quarry than is reflected in the candidate site assessment.

PPW states that it is in the interests of the minerals industry that landbanks reflect "real possibilities for future mineral working" and adds that authorities should provide "a clear guide to where nonenergy mineral extraction is likely to be acceptable".

MTAN1 explains that development plans should identify "dormant reserves" separately and states that "A more realistic landbank assessment is the aim of this process" so that a more accurate picture emerges of reserves "that are likely to have real potential for future working". It also states that the future landbank should include land specifically allocated for the working of aggregates as an "extended landbank".

The SWRAWP RTS reinforces the point that reserve arithmetic is not the whole picture. It states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects, changes in planning policy, protected site designations or other permitting constraints. This is particularly relevant given the increasingly important role of NRW licensing and abstraction controls, including quarry dewatering considerations, which may mean that some reserves are no longer as readily available or economically viable as historic landbank figures imply. Accordingly, apparent reserve sufficiency in quantitative terms may overstate the extent of genuinely deliverable supply. SWRAWP also confirms that dormant reserves "must be counted separately".

The Deposit RLDP's own framework is consistent with that broader policy approach. The Plan safeguards known limestone resources and retains quarry buffer zones so that incompatible development does not prejudice mineral operations or future working. BP25 explains that the RLDP safeguards finite mineral resources for future generations and protects them from permanent development that could sterilise or hinder extraction.

The Plan also provides a detailed framework for sustainable mineral working, including new workings, extensions and the reworking or reopening of old workings. That mechanism is intended to deal with the detailed merits of mineral proposals, including environmental effects, amenity, hydrology, transport and restoration. There is therefore no sound policy basis for adopting an unduly negative position toward Pant-y-Ffynnon Quarry at plan-making stage simply because no fresh allocation is currently required.

5. Benefits of continued extraction at Pant-y-Ffynnon Quarry

Continued extraction at Pant-y-Ffynnon Quarry would give rise to a number of important site-specific and strategic benefits.

PPW expressly recognises the planning advantages of extending established quarry sites. Paragraph 5.14.48 states that "The presence of an existing quarry should be a material consideration when considering a proposal for an extension. There may be benefits to extending a site in terms of shared infrastructure, for instance, as opposed to working a new greenfield site." That principle is directly relevant to Pant-y-Ffynnon Quarry. The site is an existing quarrying location with an established operational and planning context, and any continued working or extension would be able to build upon that existing quarrying footprint, associated infrastructure and minerals land use relationship. In planning terms, that is materially preferable to directing future working to an entirely new greenfield location, and it reinforces the case for the Deposit RLDP to continue to recognise the site positively within the minerals strategy rather than treating it as strategically unimportant simply because no fresh allocation is currently required.

The site is an existing quarrying location with an established mineral planning history. Continued extraction would therefore amount to the continuation and proper management of an existing quarrying use rather than the introduction of mineral development into a wholly new location. That is a material land use consideration.

The candidate site statement identifies the effective use of mineral resources and the avoidance of sterilisation of unworked reserves as clear benefits of the proposal. That carries substantial weight.

Mineral resources can only be worked where they occur, and it is generally more efficient and sustainable to make prudent use of an established quarry resource than to disregard it while pressure for future supply is directed elsewhere.
The site can also contribute to continuity and resilience of supply. The candidate site statement expressly states that continued quarrying at the wider site would provide continuity in mineral supply at this location and contribute to resilience through the provision of a consistent supply over the plan period and beyond. Existing operational or consented sites will often provide a more realistic and deliverable source of continuing supply than wholly new mineral sites.
Continued extraction would also support the construction industry through the provision of an adequate and continuous supply of minerals. This sits comfortably with BP25's recognition that the Vale is an "important supplier of Carboniferous limestone for general aggregate use" .
There are also local economic benefits. The candidate site submission refers to the maintenance of local economic benefits. An established quarrying operation supports employment, haulage, plant use, contractors and associated supply chains. Continued recognition of the site therefore supports local economic activity as well as mineral supply.
Environmental and restoration benefits are also relevant. The candidate site statement refers to benefits through new planting and habitat creation and treats restoration as part of the overall site concept. Continued quarrying should therefore not be considered solely in terms of extraction. It also creates the opportunity to secure restoration, habitat creation, landscape management and long-term after-use benefits through a modern planning framework.
A further important benefit is that any continued working would proceed under modern planning controls. The ROMP approval confirms that continued extraction has been reviewed through a contemporary planning process, that updated conditions now regulate the site, that the quarry must be worked in accordance with an approved working scheme, that annual production is capped at 250,000 tonnes, and that extraction may continue until 21 February 2042. That provides a robust and sustainable planning basis for future quarrying.
Continued recognition of Pant-y-Ffynnon Quarry within the Deposit RLDP would also ensure that the site remains properly integrated into the authority's safeguarding, buffer and minerals policy framework. That would provide clarity, consistency and transparency in the Plan.
6. Changes sought
The Deposit RLDP should not treat the absence of a current RTS2 requirement for further allocations as determinative of the planning treatment of Pant-y-Ffynnon Quarry.
The Plan should continue to recognise the consented quarry element positively within the minerals strategy.
The wider site should remain properly safeguarded within the minerals safeguarding and quarry buffer framework.
The supporting text should make clear that the absence of a new allocation reflects only the current RTS2 quantitative position and not any conclusion that the site is unsuitable in principle for continued quarrying.
The Plan should rely on its existing minerals development management policies, together with the ROMP framework and any future application process, to assess the detailed merits of continued working, associated development and restoration proposals at the site.
That approach would better reflect the site's planning status, the candidate site evidence, the ROMP determination and the wider objective of maintaining a sound and effective minerals strategy in the Vale of Glamorgan.
7. Conclusion
The Council's reliance on the statement that the 2nd Review of the Minerals Regional Technical Statement indicates that no further allocations are specifically required within the Vale of Glamorgan RLDP is too narrow a basis on which to assess Pant-y-Ffynnon Quarry.
That statement may explain why the Council has not identified a new formal mineral allocation on numerical grounds. It does not, however, justify removing or diluting positive recognition of an existing quarry site with an established planning status, a recent ROMP approval permitting continued extraction until 21 February 2042, and clear evidence of continuing supply, economic and restoration benefits.
Pant-y-Ffynnon Quarry should therefore continue to be positively recognised as part of the Vale of Glamorgan's minerals framework. The Deposit RLDP should distinguish clearly between the absence of a current need for a fresh allocation and the continuing strategic relevance of an established quarry site. In the case of Pant-y-Ffynnon Quarry, the latter plainly remains.
8. Summary
 Overall minerals strategy: Support in part / Object in part.
Seth Hill & Son Ltd supports the general objective of maintaining an adequate minerals supply and managing mineral resources through a plan-led framework. Objection is taken to the extent that the Deposit RLDP relies too narrowly on the RTS2 conclusion that no further allocations are specifically required, without properly reflecting the continuing role of Panty-Ffynnon Quarry as an existing quarry site with ongoing strategic relevance.
 Strategic minerals policy / supply and safeguarding approach: Support in part / Object in part.
The strategic objective of securing a continuous supply of minerals and safeguarding mineral resources is supported. Objection is taken insofar as that strategic approach is not properly

applied to Pant-y-Ffynnon Quarry, which should continue to be recognised positively within the minerals framework notwithstanding the absence of a current need for a fresh allocation.
 Policy MIN1 – Mineral safeguarding areas: Support.
Support is given to the safeguarding of limestone resources from unnecessary sterilisation. That approach is directly relevant to Pant-y-Ffynnon Quarry, particularly given that the candidate site submission sought to retain quarry status for the consented element and to safeguard the wider site for longer-term quarrying.
 Policy MIN2 – Quarry buffer zones: Support.
The principle of retaining quarry buffer zones is supported because it protects existing and future quarrying operations from encroachment by incompatible development. Continued positive recognition of Pant-y-Ffynnon Quarry sits logically alongside that buffer framework.
 Policy MIN4 – Sustainable mineral working: Support in principle.
Support is given to the policy framework for new workings, extensions and continued mineral extraction subject to environmental safeguards, amenity protection and restoration. Pant-y-Ffynnon Quarry is capable of being assessed under that framework, and detailed issues should be dealt with through the policy and application process rather than by withholding positive plan recognition now.
 Candidate Site Assessment – Pant-y-Ffynnon Quarry: Object.
Objection is taken to the candidate site assessment insofar as it relies on the statement that no further allocations are specifically required under RTS2 as the reason for not taking the site forward positively. That reasoning is too narrow because it fails to engage with the fact that the site is an existing quarrying location, that the candidate submission sought retention of quarry status as well as longer-term safeguarding, and that the site has benefited from ROMP approval ref. 2024/00246/ENV, which permits operations until 21 February 2042.
 Status of the existing quarry site: Object to insufficient recognition.
Seth Hill & Son Ltd objects to any approach which treats Pant-y-Ffynnon Quarry as strategically unimportant simply because no new allocation is numerically required. The consented quarry element should continue to be positively recognised in the Plan, reflecting its existing planning status, updated ROMP conditions and ongoing minerals planning context.
 Benefits of continued extraction at Pant-y-Ffynnon Quarry: Positive material consideration.
Continued extraction would make productive use of an existing quarry site, avoid sterilisation of unworked reserves, provide continuity and resilience of mineral supply, support local economic benefits and allow restoration-led environmental gains through planting, habitat creation and long-term after-use. Those benefits weigh in favour of continued positive recognition of the site within the Deposit RLDP.
 Soundness and evidence base: Object to insufficiently evidence-led treatment.
The Development Plans Manual requires plans to be based on “robust evidence” so they can be delivered and links candidate sites directly to the soundness question “Will the plan deliver?” The current treatment of Pant-y-Ffynnon Quarry does not fully reflect the evidence
before the Council on the site’s planning status, deliverability and continuing operational role.
 National policy compliance – PPW, MTAN1 and SWRAWP: Support in principle / Object to incomplete application.
The broad alignment of the Deposit RLDP with national minerals policy is supported. The objection is that the Plan does not go far enough in applying PPW’s reference to “real possibilities for future mineral working”, MTAN1’s requirement for a “more realistic landbank assessment”, and SWRAWP’s warning that “Caution must be exercised in using these landbank figures” when considering the ongoing role of Pant-y-Ffynnon Quarry.
 Overall position: Support in part / Object in part.
In overall terms, Seth Hill & Son Ltd supports the Deposit RLDP’s broad minerals framework. The objection is a focused one: the Plan should more clearly distinguish between the absence of a current need for a fresh mineral allocation and the continuing strategic relevance of Panty-Ffynnon Quarry as an established quarry site with planning status, ongoing supply potential and a recent ROMP approval extending operations beyond the plan period.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Deposit Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3x9
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xb
Email Representation - https://valeofglamorgan.oc2.uk/a/3xc

7127 Support

Document Element: MIN1 - DEVELOPMENT IN MINERALS SAFEGUARDING AREAS
Respondent: Tom Prichard (Holdings) Ltd [3738]
Agent: Highlight Planning

Summary:

This policy is supported because it reflects national policy by safeguarding limestone resources from permanent development that would sterilise them or hinder future extraction.

Full text:

REPRESENTATIONS TO THE DEPOSIT VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036 ON BEHALF OF TOM PRICHARD (HOLDINGS) LTD

1. Introduction

These representations are submitted on behalf of Tom Prichard (Holdings) Ltd in respect of the Deposit Vale of Glamorgan Replacement Local Development Plan 2021–2036. They relate specifically to the Plan's minerals strategy and policy framework, the treatment of dormant mineral sites, and the candidate site assessment and supporting evidence relating to Argoed Isha Quarry, Llansannor.

The respondent supports the broad direction of the Deposit RLDP minerals framework, but contends that the Plan is unsound in part in the way it presently treats Argoed Isha Quarry. The central point is straightforward: the Council's own evidence accepts that usable reserves remain at the site, that those reserves could still be extracted if required, and that the site has the potential to be reworked. Yet that conclusion is not carried through into a sufficiently positive and coherent plan-led position.

The objection is therefore not to the principle of maintaining a minerals strategy founded on safeguarding, environmental protection and modern control of extraction. Nor is it suggested that the Plan must necessarily allocate Argoed Isha as a new specific site simply because a candidate site was submitted. Rather, the objection is that the Deposit RLDP does not properly reflect the evidential position it has itself reached. It acknowledges that Argoed Isha should not be made subject to a Prohibition Order, but stops short of recognising clearly that the site remains a dormant limestone quarry with continuing mineral significance, realistic future reactivation potential and scope for future working under modern planning controls, restoration obligations and biodiversity enhancement.

2. Site context and planning status

Argoed Isha is a long-established limestone quarry. The candidate site planning statement explains that the site has a historic quarry planning status, that recommencement would require updated working conditions, and that the site was promoted through the candidate site process precisely because there remains interest in recommencing mineral extraction. The same statement records the local planning authority's earlier position that, in relation to a previous proposal, the Council could only seek a Prohibition Order if it was satisfied that resumption of extraction was unlikely, but that "this requirement is not met" at Argoed Isha because of continuing interest in re-opening the quarry. It also records the mineral adviser's view that "The site currently has planning permission for a quarry" and that, absent relinquishment, "the permission to quarry remains valid".

The candidate site material also addresses availability and deliverability. It states that the site is available for development, that the proposal is considered viable and deliverable owing to the underlying need for the mineral, and that the site is a brownfield / underutilised site. It further notes that the proposal comprises mineral development within a mineral safeguarding area and within a site which benefits from a planning permission for quarrying, such that it is considered acceptable in principle. Those points are important because they show that Argoed Isha is not simply a theoretical reserve detached from any realistic prospect of future use.

3. Soundness and the role of evidence

The Development Plans Manual states that plans should be based on robust evidence so they can be delivered and that LPAs must be able to demonstrate, in broad terms, that the plan is deliverable with no significant impediments to implementation. It also emphasises the importance of a detailed candidate site process and of ensuring delivery and viability are embedded in that process from the outset. Elsewhere, the Manual explains that the plan-making process should prepare more effective, efficient and deliverable plans and refers expressly to the tests of soundness which must be satisfied if a development plan is to be recommended for adoption.

Those principles matter here because the Council had before it a candidate site submission which set out the site's planning status, constraints, deliverability and rationale for retention as a mineral site. It also had its own local evidence in BP25 and the wider regional evidence from RTS2, the sub-regional collaboration work and SWRAWP. In those circumstances, a sound plan ought to explain clearly how that evidence has informed the Council's chosen strategy for Argoed Isha. In the respondent's submission, the Deposit RLDP presently falls short because it recognises part of the evidence, but not its full implications. The Plan is therefore unsound in part because it is not fully justified by the evidence and is not as effective as it should be in setting out a coherent future approach to this dormant but still viable mineral resource.

4. National policy context – Planning Policy Wales

Planning Policy Wales establishes the national context for these representations. It requires planning authorities to maintain landbanks for non-energy minerals in demand and states that, for crushed rock, a minimum ten-year landbank should be maintained through the plan period unless agreement is reached for other authorities to make a compensating increase in provision. PPW also recognises that individual authority boundaries are not always an adequate basis for landbank policy where environmental constraints are too important or workable resources too limited, in which case authorities must agree a joint approach with neighbouring authorities in line with regional arrangements.

PPW is especially important in relation to inactive sites. Paragraph 5.14.17 provides that inactive sites

with planning permission for future working which are considered unlikely to be reactivated should be identified in the development plan and should be the subject of a suitable strategy, which could include prohibition orders, restoration and aftercare proposals, and a suitable proposed after-use.
Paragraph 5.14.18 then states that “It is in the interests of the minerals industry that landbanks reflect real possibilities for future mineral working” and adds that, where sites have been inactive and “there is no prospect of future working”, authorities should consider the use of prohibition orders.
That distinction is central to the present case. The Council has not concluded that there is no prospect of future working at Argoed Isha. Quite the contrary: BP25 states that usable reserves remain at the site, that they could be extracted if required, and that they have the potential to be reworked. The logic of PPW is therefore that Argoed Isha is not a site to be treated as effectively closed or exhausted. It remains a site with continuing mineral relevance, albeit one that would require modern conditions and a fresh scheme of workings before any extraction could recommence.
PPW is also directly relevant to areas of future working. Paragraph 5.14.19 states that “Where necessary, planning authorities should provide a clear guide to where non-energy mineral extraction is likely to be acceptable” and that policies and proposals should cover mineral resources “which are currently used or which may need to be used in the foreseeable future”. It further explains that such areas should be clearly identified on a proposals map and may take the form, in order of preference, of specific sites, preferred areas or areas of search.
The respondent does not suggest that PPW compels the Council to identify Argoed Isha as a specific site. However, PPW plainly supports a more positive and more explicit plan-led recognition of sites which retain real future mineral potential. Once the Council’s own evidence accepts that Argoed Isha is such a site, it is difficult to reconcile a largely passive policy response with the national expectation that development plans should give a clear guide to where future mineral working may be acceptable.
5. National policy context – MTAN1
MTAN1 reinforces the need for a realistic and evidence-based approach to landbanks and dormant sites. It explains that a landbank is composed of permitted reserves at active and inactive sites, and that development plans should include an assessment of both the current and future landbank.
Paragraph 47 then states that development plans should identify those sites that are dormant and count these as “dormant reserves” to be clearly shown in landbank calculations as a separate category. Paragraph 48 continues by stating that a more realistic approach is required, observing that extensive historic landbanks can perpetuate unsustainable supply patterns if left unaltered. MTAN1 therefore states that “A more realistic landbank assessment is the aim of this process” so that a more accurate picture is obtained of permitted reserves “that are likely to have real potential for future working”.
That policy language is highly material. It confirms that dormant reserves are not irrelevant simply because they are not counted within the active landbank. They are to be identified separately and realistically assessed. That is precisely the position that should be taken with Argoed Isha. The Council has already undertaken the essential assessment in substance through BP25 and has concluded that usable reserves remain and that the site has the potential to be reworked. MTAN1 therefore supports a more nuanced and more positive treatment of the site than a simple “no allocation required” conclusion.
MTAN1 also recognises that in some authorities it may not be possible or acceptable to provide an adequate current or extended landbank because of environmental designations, limited suitable resources, or amenity considerations, and that RAWPs should consider the environmental capacity of authorities to supply aggregates. This is an important reminder that reserve arithmetic is not the only issue. Deliverability, environmental capacity, and the practical availability of reserves remain relevant.
6. Apportionment and Plan Period
The regional and sub-regional evidence does not undermine the respondent’s case. It explains why there is no present quantitative requirement for a further minerals allocation in the Vale, but it does not justify a negative or dismissive treatment of Argoed Isha.
BP25 records the RTS2 and Statement of Sub-Regional Collaboration position for the Cardiff City subregion. Table 5 identifies the Vale of Glamorgan apportionment for crushed rock as 17.05 million tonnes over 25 years, with existing permitted reserves of 18.73 million tonnes at the end of 2016 and a minimum allocation needed of 0, alongside 13 million tonnes of additional reserves at dormant sites. BP25 then states that, based on those figures, the SSRC identifies that the Vale of Glamorgan does not require any allocations for future workings of crushed rock to be identified within the RLDP.
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council’s current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated review of mineral reserves) would therefore ensure a sound plan.
Notwithstanding our comment in respect of the Plan Period, we remain concerned of how the Plan

should treat a dormant site which the Council accepts has remaining usable reserves and realistic reactivation potential. Nor does it justify treating Argoed Isha as though it lacked future significance. The respondent's case is therefore not that the RTS2 figure is wrong, but that it has been taken too far. A conclusion that no additional formal allocation is presently required is not the same thing as a conclusion that the site has no future role.

7. BP25 – the Council's own minerals evidence

BP25 is the most important local evidence document for present purposes. It records that the Vale of Glamorgan is an "important supplier of Carboniferous limestone for general aggregate use". It then addresses dormant mineral sites in the Vale. Paragraphs 5.48 to 5.50 explain that many dormant sites have not been worked for many years and are considered unlikely to be worked in the future; accordingly, the Council intends to serve Prohibition Orders on those sites, which would provide certainty for nearby residents and remove reserves which are not realistically available. BP25 also explains that the level of reserves at dormant sites is not counted in the landbank.

Crucially, BP25 then distinguishes Argoed Isha from that general class of dormant sites. Paragraph 5.51 states: "While Argoed Isha quarry is classified as 'dormant', useable reserves remain at the site and could be extracted if required." It goes on to record that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030, but then adds: "While the reserves at the site are not included in the current landbank, they have the potential to be reworked and therefore a Prohibition Order will not be served at Argoed Isha Quarry until the current circumstances change."

That is a very clear evidential conclusion. BP25 does not simply refrain from prohibiting the site without explanation. It positively explains why Argoed Isha is different: usable reserves remain, they could be extracted if required, and they have the potential to be reworked. In the respondent's submission, that conclusion requires a correspondingly clearer and more positive policy response within the Deposit RLDP than is presently provided.

BP25 is also supportive on restoration and aftercare. It states that the serving of Prohibition Orders is intended to provide certainty and, where necessary, restoration of sites may be sought. More broadly, the background paper recognises the importance of sustainable minerals management and balancing mineral extraction with environmental protection and community well-being. That policy background is entirely consistent with the respondent's case that any future working at Argoed Isha should be controlled through a modern framework of environmental safeguards and restoration-led after-use.

8. SWRAWP Annual Report 2024

The SWRAWP Annual Report 2024 is also highly relevant because it warns against over-reliance on headline landbank figures. Paragraph 4.10 states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects that may restrict the availability of certain reserves, nor constraints arising from changes in planning policy, protected site designation or other non-planning permitting requirements. Paragraph 4.11 then confirms that dormant sites have not been included in landbank calculations and that local planning authorities should carry out their own assessments of the likelihood of reactivation, but that in any event "dormant reserves must be counted separately".

That evidence materially supports the respondent's case. It shows that the statement "no further allocations are specifically required" is not, in itself, the end of the analysis. Landbank figures are a starting point, but they do not tell the whole story. Questions of practical availability, regulatory and environmental constraints elsewhere, and the separate role of dormant reserves remain relevant. Argoed Isha therefore retains importance as part of the broader mineral resource picture even though it is not part of the active landbank.

9. Response to the Council's candidate site assessment

The Council's candidate site assessment records that a positive allocation for mineral working is not included because "the 2nd Review of the Minerals Regional Technical Statement indicates no further allocations are specifically required to be identified within the Vale of Glamorgan RLDP". That point should be addressed directly.

The respondent accepts that the RTS2 position explains why the Council may have concluded that there is no immediate need for a fresh mineral allocation in quantitative terms. However, that is not a sufficient reason, on its own, to reject a more positive policy treatment of Argoed Isha or to give the impression that the site lacks future significance. BP25 itself shows why. It records both that the Vale does not presently require additional allocations and, separately, that Argoed Isha retains remaining usable reserves and has the potential to be reworked. Those two propositions are not inconsistent. They point toward a more nuanced and more accurate conclusion: namely, that Argoed Isha may not need to be allocated now to meet a current numerical shortfall, but it remains a dormant limestone reserve of continuing strategic relevance that should be positively recognised within the Plan.

That approach is also supported by PPW, MTAN1 and SWRAWP. PPW states that landbanks should reflect "real possibilities for future mineral working" and that prohibition orders are appropriate where there is "no prospect of future working". MTAN1 requires dormant reserves to be separately identified and assessed so as to achieve "A more realistic landbank assessment". SWRAWP says that "Caution must be exercised" in using landbank figures and that dormant reserves must be counted separately. Those documents all point to a need for a broader planning judgment than simple reserve arithmetic.

Accordingly, the flaw in the candidate site reasoning is not that it refers to the RTS2 position, but that

it appears to stop there. In the respondent's submission, the sounder and more evidence-based approach would have been either to give the site more positive recognition in the Plan's supporting text, or at the very least to make clear that the site was not allocated because no immediate additional allocation was required, not because the site lacked merit, availability or future potential.

Moreover, SWRAWP reinforces the point that reserve arithmetic is not the whole picture. It states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects, changes in planning policy, protected site designations or other permitting constraints. This is particularly relevant given the increasingly important role of NRW licensing and abstraction controls, including quarry dewatering considerations, which may mean that some reserves are no longer as readily available or economically viable as historic landbank figures imply. Accordingly, apparent reserve sufficiency in quantitative terms may overstate the extent of genuinely deliverable supply.

10. The existing temporary training permission does not sterilise the reserve

BP25 states that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030. The significance of that point is not that the site has permanently moved away from minerals. The significance is the opposite: BP25 records the temporary training use while simultaneously concluding that usable reserves remain and may be reworked, and that a Prohibition Order should therefore not be served.

In planning terms, a temporary training use of this kind cannot properly be treated as sterilising the mineral reserve. PPW's safeguarding policy is concerned with preventing sterilisation by permanent development. A time-limited interim use, particularly one expressly acknowledged in BP25 as coexisting with a potentially reworkable reserve, does not extinguish the underlying mineral significance of the site. The temporary training use should therefore be understood as an interim overlay rather than a permanent change in land use character.

11. Benefits of continued extraction at Argoed Isha Quarry

Continued extraction at Argoed Isha Quarry would give rise to a number of site-specific and strategic benefits which the Deposit RLDP should recognise when considering the future role of the site.

The site is not a greenfield mineral proposal on an entirely undeveloped site. It is an existing quarry with a long-established mineral planning history and extant mineral status in principle, subject to updated modern conditions. The principle of mineral working at the site is therefore already established in land use terms, and the future reworking of the reserve would represent the continuation of an existing mineral use rather than the introduction of quarrying into a wholly new location. That is a material distinction when considering the appropriateness of retaining the site as a realistic future mineral resource.

Continued extraction would also assist in making use of a proven local limestone resource in the Vale of Glamorgan, rather than forcing greater reliance on more distant or more constrained sources. BP25 confirms that the Vale is an "important supplier of Carboniferous limestone for general aggregate use". In practical terms, continued extraction at Argoed Isha would accord with the proximity principle by helping to meet demand from a comparatively well-located source close to markets in the Vale and wider Cardiff area, rather than depending unduly on more remote sources or on supply patterns that may become more constrained over time.

The site would also contribute to the resilience and flexibility of the wider minerals supply position. Even if no immediate additional allocation is numerically required under RTS2, national and regional policy make clear that landbank figures are not the only relevant consideration. A dormant quarry with remaining usable reserves provides contingency, flexibility and productive capacity in the event that supply circumstances change during the plan period. This is especially important where SWRAWP warns that landbank figures do not capture geographical, operational, policy or other permitting constraints, and where MTAN1 requires a realistic view of reserves with future potential. Argoed Isha therefore has value not merely as a theoretical reserve, but as part of a resilient longer-term supply position.

Continued extraction at Argoed Isha would also support local supply chains and a more diverse quarrying sector. The candidate site submission identified the benefit of maintaining provision from a range of operators, including smaller and medium-sized businesses, rather than relying only on a limited number of larger established sites. In planning terms, that diversity is relevant to continuity of supply, competition, responsiveness to local demand and the overall resilience of the minerals sector in the Vale and wider region.

A further benefit is that any future extraction would be carried out under modern planning control rather than being left sterilised or underused. If the site is reworked in future, that would necessarily be through a fresh scheme of modern conditions and under the policy framework of the RLDP and national minerals policy. Issues such as traffic, hydrology, hydrogeology, ecology, landscape, amenity, blasting, dust, restoration and long-term aftercare would all be capable of being addressed through a contemporary planning and environmental control regime. That is an important benefit in itself, because it means any future extraction would not take place under outdated historic controls, but under a modern framework designed to secure sustainable mineral working.

Continued extraction would also create the opportunity for a comprehensive restoration and aftercare strategy delivering environmental gains. PPW recognises that restoration and aftercare proposals for inactive sites may include natural re-vegetation for nature conservation and ecological interests. BP25 records that restoration may be sought where necessary. In practice, any future extraction

proposal at Argoed Isha could be accompanied by a restoration-led scheme involving landform improvement, habitat creation, ecological enhancement and long-term stewardship. The site should therefore not be seen simply as a mineral reserve, but as a place where carefully managed extraction could unlock biodiversity, landscape and geodiversity benefits over time.
The site also represents the productive use of an underutilised brownfield quarry. The candidate site material identifies it as a brownfield / underutilised site. In land use terms, there is a clear logic in making effective use of an existing quarried landscape with established mineral status, rather than placing additional pressure on wholly undeveloped land elsewhere. In this case, the Council's own evidence confirms the key factor: usable reserves remain and the site has the potential to be reworked.
There is finally a longer-term safeguarding benefit in recognising the case for continued extraction. PPW requires mineral resources to be safeguarded to prevent sterilisation by permanent development, and makes clear that landbanks should reflect "real possibilities for future mineral working". Positive recognition of the benefits of continued extraction at Argoed Isha is therefore entirely consistent with the basic objectives of national minerals policy: prudent use of finite mineral resources, maintenance of flexibility in supply, and avoidance of circumstances in which sites with genuine future potential are prematurely written off.
12. Restoration, aftercare and biodiversity gain
The respondent's case is not simply that Argoed Isha should be recognised as a future mineral source. It is also that any future reworking can and should be subject to a modern restoration-led scheme capable of securing environmental gains.
PPW contemplates restoration and aftercare proposals for inactive sites, including natural revegetation for nature conservation and ecological interests. BP25 records that, where necessary, restoration may be sought at dormant sites. The candidate site material also identifies that the site is not close to internationally or nationally important wildlife sites, while noting the presence of existing ecological and geological interests that could be appropriately managed through buffers, mitigation and future planning controls. These are precisely the kinds of circumstances in which a carefully designed extraction and restoration scheme could deliver meaningful biodiversity and geodiversity benefits alongside the prudent working of the remaining mineral resource.
Future working at Argoed Isha should therefore not be viewed in binary opposition to environmental enhancement. The modern policy framework envisages integrated mineral development in which extraction, restoration and aftercare are part of a single coherent process. That is an additional reason why the Plan should positively recognise the site's continuing potential rather than leaving it in a policy grey area.
13. Overall conclusion
The evidence base points clearly to a more positive and more coherent treatment of Argoed Isha than is presently provided in the Deposit RLDP.
PPW says that landbanks should reflect "real possibilities for future mineral working" and that prohibition orders are appropriate where there is "no prospect of future working". MTAN1 requires a separate assessment of "dormant reserves" and seeks "A more realistic landbank assessment". SWRAWP states that "Caution must be exercised in using these landbank figures". BP25 records that "useable reserves remain at the site and could be extracted if required" and that they "have the potential to be reworked". The Development Plans Manual requires plans to be based on robust evidence and to be deliverable.
Against that background, the Council's reliance on the proposition that the RTS2 indicates no further allocations are specifically required does not dispose of the issue. It may explain why there is no immediate need for a fresh mineral allocation, but it does not justify a passive or dismissive treatment of Argoed Isha. The more sound and evidence-based approach is to recognise that, whilst no additional formal allocation is presently required, Argoed Isha remains a dormant limestone quarry with usable reserves and realistic future reactivation potential, capable of coming forward in future under modern policies for sustainable working, restoration and aftercare.
14. Summary
These representations contend that, whilst the Deposit RLDP minerals strategy is broadly supported, the Plan is unsound in part in its treatment of Argoed Isha Quarry. In particular, the objection goes principally to whether the Plan is justified by the evidence and whether it is effective in delivery. The objection also concerns consistency with national minerals policy to the extent that the Deposit RLDP does not fully reflect PPW and MTAN1 in positively planning for the safeguarding and potential future working of this identified limestone resource.
 Strategic Policy SP18 – Minerals Supply and Safeguarding: Support in part / Object in part.
The respondent supports the overarching strategy of maintaining a continuous supply of minerals, safeguarding mineral resources and avoiding sterilisation. However, objection is taken insofar as the strategy does not carry through the Council's own evidence that Argoed Isha retains usable reserves and future potential for reworking.
 Policy MIN1 – Mineral Safeguarding Areas: Support.
This policy is supported because it reflects national policy by safeguarding limestone resources from permanent development that would sterilise them or hinder future extraction.
That approach is directly relevant to Argoed Isha, which remains a safeguarded resource with extant mineral significance.

 Policy MIN2 – Quarry Buffer Zones: Support.
The principle of protecting mineral operations from encroachment by incompatible development is supported. If Argoed Isha is to remain a realistic future source of limestone, the Plan should continue to avoid prejudice to its potential reactivation.
 Policy MIN3 – Dormant Mineral Sites: Support in principle / Object in part.
The respondent supports the Council's decision not to serve a Prohibition Order at Argoed Isha. That is plainly the correct approach because BP25 confirms that usable reserves remain and may be reworked. However, objection is taken to the absence of stronger wording recognising that the site remains a realistic future source of limestone.
 Policy MIN4 – Sustainable Mineral Working: Support in principle.
The respondent supports the policy framework for future reworking or reopening of old workings, including the need for acceptable impacts, restoration and beneficial after-use. Argoed Isha is capable of being assessed under that type of modern policy framework.
 Supporting text to the dormant quarry provisions / paragraph 6.386 equivalent approach: Object in part.
The Plan is correct to recognise that the reserves at Argoed Isha could be reworked in future. The objection is that this conclusion is not carried through into a fuller and more positive policy narrative.
 Plan Period: Object.
Amend in line with the Development Plans Manual such that there are at least 10 years remaining at adoption.
 Candidate Site 411 – Argoed Isha Quarry: Object.
The respondent objects to the candidate site assessment insofar as the site appears to have been rejected solely or mainly because RTS2 indicates that no further allocations are specifically required. That is too narrow an approach and does not properly reflect PPW, MTAN1, SWRAWP or BP25's conclusion that usable reserves remain and may be reworked.
 Minerals Background Paper BP25: Support in part / Object in part.
BP25 is supported where it correctly records that Argoed Isha is dormant, that usable reserves remain, and that the site has the potential to be reworked. Objection is taken only insofar as the Deposit RLDP does not fully reflect the implications of that evidence in a more positive and coherent plan-led position.
 Temporary training use: Clarificatory comment in support of the representation.
The current training use does not sterilise the limestone reserve. BP25 records the temporary training use until 2030 while also confirming that usable reserves remain and that the site may be reworked. It should therefore be treated as an interim use only.
 Benefits of continued extraction at Argoed Isha: Positive material consideration.
Continued extraction at Argoed Isha would make productive use of an existing dormant quarry with remaining usable reserves, support local and sub-regional limestone supply from a Vale source, contribute to flexibility and resilience in the minerals strategy, and enable future working to proceed under modern planning controls with restoration, aftercare and biodiversity enhancement.
 Overall position on the Deposit RLDP minerals strategy: Support in part / Object in part.
In overall terms, the respondent supports the Deposit RLDP's general minerals framework.
The objection is a precise and limited one: the Plan should more clearly and positively recognise Argoed Isha as a dormant quarry with usable reserves, realistic reactivation
potential, and scope for a future scheme of continued extraction and restoration, such that the Plan is properly justified by its evidence base and effective in delivering a resilient minerals strategy over the plan period.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3j3
Email Representation - https://valeofglamorgan.oc2.uk/a/3j4

4821 Object

Document Element: MIN2 - QUARRY BUFFER ZONES

Respondent: Mr Rob G Thomas [683]

Summary:

Longlands Quarry
Quarry site and quarry buffer zone

Intrusion into open countryside
Impact on visual amenities
Impact on traffic and highways
Increased noise
Increase dust
Impact on local properties
Loss of good agricultural land under ALC Wales Predictive Map and BMV land loss
Industrialisation of the countryside

Full text:

MIN2/MIN3
Longlands Quarry
Quarry Site and Quarry Buffer Zone
7.8 ha currently
44.1 ha RLDP buffer zone expansion

Intrusion into open countryside
Impact on visual amenities
Impact on traffic and highways
Increased noise
Increase dust
Impact on local properties
Loss of good agricultural land under ALC Wales Predictive Map and BMV land loss
Industrialisation of the countryside

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/sf9

6813 Object

Document Element: MIN2 - QUARRY BUFFER ZONES

Respondent: Mineral Products Association (Mr Peter Nicholas Horsley, Planning Director) [689]

Summary:

Object - Proposed subsection 2 is not an exception to the national buffer zone policy PPW (5.14.44) and should therefore be deleted.

Delete Subsection 2 “Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:

1 The proposal would not constrain the operations of the mineral site; or”

(~2 The proposal is located within an existing built-up area which already encroaches into the buffer zone.~)”

Full text:

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and industrial sand industries. MPA is the sectoral voice for mineral products, covering 100% of UK cement and lime production, 90% of GB aggregates production, 95% of asphalt and over 60% of ready-mixed concrete and precast concrete production. In 2023, the industry supplied £18.4 billion worth of materials and services to the Economy, directly generating £6.7 billion in Gross Value Added (GVA). It is the largest supplier to the construction industry, which generated £141.5 billion in GVA in 2023. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting us on the above document. Mineral supply will be critical to delivering many of the objectives identified in the preferred strategy as well as many of the national infrastructure project proposed such as floating offshore wind in the Celtic Sea. We have major concerns over the reliance on outdated reserve information and the evidence base must reflect up to date reserve and sales statistics, together with projected demand for major

developments.

It is disappointing that despite previous representations in 2022 & 2024, the points highlighted have not been addressed. We have therefore, reiterated our concerns below. We have also suggested alternative wording where appropriate.

We welcome further engagement on this matter to address the concerns.

2.50 Regional Technical Statement for Aggregates (2020) Second Review
We support the reference to the RTS (2nd Review), however, as the authority should be aware, WG has commission a further review (RTS3) which is expected to be published at the end of 2026/early 2027
Note the comment as this will be a material consideration as the plan progresses.

5.35 Barry Docks – ABP Masterplan.
Support - We note ABP's potential for rare earth processing at the Black Rocks Growth Zone and would support such a proposal.
No further comment

SP17 SUSTAINABLE WASTE MANAGEMENT
Support - We note the proposals to facilitate sustainable waste management facilities on …. operational or non-operational mineral working sites and would support this.
No further comment

SP18 Sustainable Provision of Minerals
The local and regional need for the provision of a continuous supply of minerals will be achieved through:
1 Maintaining a minimum of 10 years land bank of crushed rock throughout the plan period.
2 Favouring proposals which promote the sustainable use of minerals and encourage the use of secondary and alternative resources.
3 The safeguarding of known resources of sandstone, limestone, sand and gravel (where these occur outside settlements), from permanent development that would unnecessarily sterilise them or hinder their future extraction; and
4 Safeguarding railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate.
Object - Whilst we can support various elements in the proposed policy, we have concerns over the specific wording in it and the supporting text.
Most notably, subsection 2 does not accord with the PPW (5.11.4) in relation to the use of secondary and RECYCLED materials. It is not clear what is meant by "ALTERNATIVE RESOURCES". This should be replaced. Secondly, PPW "PROMOTES THE USE" and does not reference "favouring proposals. Accordingly, the wording should be amended to reflect PPW
Also, in relation to subsection 4, the proposed policy does not seek to apply safeguarding to minerals infrastructure as is required by PPW (5.14.7 & 5.24.8). Minerals infrastructure is more than just transportation hubs, it includes the wider processing facilities. Subsection 4 should therefore be amended.
The Policy should be amended to read -
"2 (~Favouring proposals which~) Promote the sustainable use of minerals and encourage the use of secondary and RECYCLED MATERIALS. (~alternative resources~)."
"4 Safeguarding EXISTING AND PLANNED INFRASTRUCTURE, INCLUDING railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, TOGETHER WITH WIDER MINERALS PROCESSING INFRASTRUCTURE.
6.373 This paragraph states "The 2nd Review of the Minerals Regional Technical Statement for the South Wales area, commonly referred to as RTS2, was published by the South Wales Regional Aggregates Working Party (SWRAWP) in September 2020. Appendix B of the RTS includes specific recommendations and guidance for each Local Planning Authority."
While this statement is factual, we suggest an additional sentence to reflect that Welsh Government has commission a further review of the Regional Technical Statement (RTS3) which has already commenced and is scheduled for completion by the end of 2026.
Add additional sentence to reflect RTS3.

6.374 This paragraph states
"In November 2021, the Welsh Government's Chief Planning Officer issued a Policy Clarification letter to rectify an arithmetical error within the RTS2. The clarification letter indicated that the apportionment for the Vale of Glamorgan is 17.05 million tonnes of crushed rock over 25 years. There is an existing landbank of 18.73 million tonnes of crushed rock (as of 31st December 2016), all of which relates to Carboniferous Limestone. There is no apportionment and no land bank for land-won sand and gravel."
We have significant concerns that the evidence base for the local plan has not been updated. Whilst RTS2 is undoubtedly material, the statement that "There is an existing landbank of 18.73 million tonnes of crushed rock" is not correct. As stated in the text, this is the landbank as of 31st December 2016. The Council must update its evidence base and provide a landbank figure which reflects the current permitted reserves.
Since the publication of the RTS2, there have been numerous publications to assist in updating the evidence base including the SWRAWP reports and AM2023.
In our responses to earlier iterations and consultations on the RLDP we highlighted the need for the Council to update

the reserve figures. We also highlighted that planning submissions had indicated that circa 16.5mt of permitted reserve is suitable for non-aggregate use.
It is not clear if this tonnage is included in the 18.73mt referred too.
Greater clarity and analysis is required.

6.374 The wording also states “The report concludes that in view of the slight surplus of existing permitted crushed rock reserves and the lack of sand and gravel production in the Vale of Glamorgan, no further allocations are specifically required to be identified within the RLDP.”
The “slight surplus” referred to was the position at 31st December 2016. The reserve figure needs to be updated.
Update the reserve figures to allow an accurate landbank tobe determined and the need for future allocations to be properly assessed. This should separate out projected aggregate and non-aggregate reserves to ensure clarity.

6.375 The wording states “The RTS2 requires Statements of Sub-regional Collaboration (SSRC) to be prepared by all constituent LPAs within each RTS sub-region. The Vale of Glamorgan along with Bridgend, Cardiff, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly and the Brecon Beacons National Park forms part of the Cardiff City subregion. The latest position statement for this sub-region (July 2022) indicates that while most authorities in the region, including the Vale of Glamorgan, can meet their apportionment for crushed rock, there is a shortfall of 7.475 million tonnes (Mt) within Cardiff that would require an additional RLDP allocation.”
Whilst the position statement referred to may suggest that the apportionment can be adequately met, as highlighted above, there are major concerns that the evidence base being relied upon is out of date. Further, Annex A of the RTS requires that “The LPAs involved should demonstrate, as far as possible, that the SSRC has been produced in consultation with relevant stakeholders, including the Regional Aggregate Working Party (RAWP), as part of the LDP process.” This has not been done and as such the SSRC process adopted is fundamentally flawed.
As clearly stated in our previous representations, there are major concerns over the evidence base and the process of relying upon an SSRC which has not followed the requisite protocol.

MIN1 Development in Minerals Safeguarding Areas
Whilst we support the principle of the policy, we suggest the addition of a further subsection addressing the scope for prior extraction. PPW (5.14.7) states “the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered.”
Add a further subsection to address the principle of prior extraction.

MIN2 Quarry Buffer Zones
This policy states “Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or
(~2 The proposal is located within an existing built-up area which already encroaches into the buffer zone.”~)
Object - Proposed subsection 2 is not an exception to the national buffer zone policy PPW (5.14.44) and should therefore be deleted.
Delete Subsection 2 “Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or”
2 The proposal is located within an existing built-up area which already encroaches into the buffer zone.”

MIN4 Sustainable Mineral Working.
This policy states
“Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will only be permitted where there is a proven national, regional or local need for the mineral and where:”
Object - This policy wording does not reflect PPW (5.11) which seeks to “promote” and not “prioritise” the use of recycled material and secondary aggregates.
Further the word “only” is superfluous and should be deleted.
Reword the policy
“Proposals which PROMOTE (~prioritise~) the use of recycled material and secondary aggregates AS AN ALTERNATIVE TO (~before new sources of~) primary materials (~are developed~) will be SUPPORTED (~favoured~) where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will (~only~) be permitted where there is a proven national, regional or local need for the mineral and where:”

6.388 The wording states “In view of the current landbank of reserves with planning permission at existing mineral working sites within the Vale of Glamorgan, there is no requirement for the Plan to allocate additional areas for limestone extraction.”
As stated above, the Evidence Base has not been updated to provide a true representation of the landbank. The permitted reserves being quoted date from 2016 and cannot provide a sound platform upon which mineral provision or requirements can be determined.
Update the evidence as required.

6.389 The wording states “Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured. The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore, the extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (MTAN1 Paragraph 34).” As stated above, the PPW seeks to promote the use of secondary and recycled aggregates. The council has not provided any evidence that secondary and recycled materials are not being maximised, or that primary materials are being used instead of secondary material. There is simply no evidence of “overprovision”. Further this is a misquote of MTAN1 Paragraph 34.
Amend the text accordingly.
Reword the text “Proposals which (~prioritise~) PROMOTE the use of recycled material and secondary aggregates (~before new sources of~) AS AN ALTERNATIVE TO primary materials (~are developed~) will be SUPPORTED (~favoured~). (~The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore~), The extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (~(MTAN1 Paragraph 34)~)

Change suggested by respondent:

Delete Subsection 2 "The proposal is located within an existing built-up area which already encroaches into the buffer zone".

Sound: Not specified

Attachments:

Redacted Email Representation - https://valeofglamorgan.oc2.uk/a/3hn

7122 Support

Document Element: MIN2 - QUARRY BUFFER ZONES

Respondent: Seth Hill & Son Ltd [1197]

Agent: Highlight Planning

Summary:

The principle of retaining quarry buffer zones is supported because it protects existing and future quarrying operations from encroachment by incompatible development.

Full text:

REPRESENTATIONS TO THE DEPOSIT VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036 ON BEHALF OF SETH HILL AND SON LTD

1. Introduction

These representations are submitted on behalf of Seth Hill & Son Ltd in response to the Deposit Vale of Glamorgan Replacement Local Development Plan 2021–2036.

They relate specifically to the treatment of Pant-y-Ffynnon Quarry / Seth Hill Quarry, Bonvilston in the Deposit Plan and the associated candidate site assessment process.

The principal concern arises from the Council’s candidate site assessment, which states that a positive allocation for mineral working is not included because “The 2nd Review of the Minerals Regional Technical Statement indicates no further allocations are specifically required to be identified within the Vale of Glamorgan RLDP.”

That explanation addresses only the narrow issue of whether a fresh minerals allocation is presently required on RTS2 arithmetic. It does not adequately address the planning merits of Pant-y-Ffynnon Quarry itself, nor does it justify a limited or negative treatment of the site in the Deposit RLDP.

These representations therefore object to the overly narrow basis on which the site appears to have been discounted for positive recognition and seek a more balanced and evidence-based treatment of Pant-y-Ffynnon Quarry within the Plan.

2. Site context

Pant-y-Ffynnon Quarry is an established quarrying location with an existing mineral planning history and an established role within the local minerals framework.

The candidate site planning statement explains that the site comprises the full extent of the currently consented Ffynnon Quarry, together with adjoining land to the south. It confirms that the quarry extracts limestone and that the consented quarry element is identified in the adopted LDP as a Quarry Site, with adjoining land within the Buffer Zone and wider Mineral Safeguarding Area. The submission sought to retain the existing LDP status of the consented element and to safeguard the potential for further quarrying to take place on the remainder of the site in the longer term.

The candidate site statement also recorded the continuing active planning context at the site, including application ref. 2021/01379/FUL for the resumption of limestone extraction in the North Quarry, the

establishment of an aggregates recycling facility, and restoration of the North Quarry using inert waste materials. That position has since been materially reinforced by the ROMP determination.
Decision notice 2024/00246/ENV is a Determination of New Working Conditions for Pantyffynnon Quarry / Seth Hill Quarry, Bonvilston. The decision provides that the new conditions replace those attached to permissions 97/01084/FUL and 2009/00184/ENV. Condition 1 states that "No operations authorised by this permission, with the exception of restoration and after-treatment works approved under these conditions shall take place after 21 February 2042." The decision also requires a detailed working scheme, revised working programmes every five years, and imposes an annual production limit of 250,000 tonnes.
BP25 independently corroborates the continuing active status of the quarry. It identifies Pantyffynnon in Table 1 as an active quarry with an extraction end date of 21.02.2042. BP25 also confirms that the Vale of Glamorgan is an "important supplier of Carboniferous limestone for general aggregate use".
Taken together, that evidence confirms that the site is not simply a historic quarry with uncertain prospects. It is an active quarry with a recently updated modern conditions framework and an extraction end date beyond the RLDP period.
3. Objection to the candidate site assessment
The Council's candidate site assessment relies on the proposition that no further allocations are specifically required because of the RTS2 position. That reasoning is too narrow.
The statement that no further allocations are specifically required may explain why the Council has concluded that it does not presently need to identify a fresh minerals allocation in order to meet the current quantitative apportionment. It does not, however, address the separate issue of how the Plan should treat an existing quarry site such as Pant-y-Ffynnon Quarry.
The absence of a current need for a new allocation is not the same as a conclusion that an established quarry site should cease to be positively recognised, should no longer be meaningfully safeguarded, or should be treated as strategically unimportant.
The candidate site submission itself demonstrates why the Council's reasoning is incomplete. The submission did not merely seek a fresh allocation on the basis of additional tonnage need. It sought retention of the existing quarry status of the consented element and safeguarding of the wider site for longer-term quarrying potential.
The ROMP decision strengthens that point considerably. A site that has recently been granted updated mineral working conditions and is authorised to continue operations until 21 February 2042 cannot sensibly be treated as though its future role is immaterial simply because current RTS2 figures do not require a further allocation elsewhere in the Vale.
The Council's approach is also difficult to reconcile with national plan-making guidance. The Development Plans Manual states that plans should be based on "robust evidence" so they can be delivered, that candidate sites should not be purposefully excluded from assessment, and that the key objective is whether a promoter has a serious intention to bring the site forward, which links directly to the soundness question "Will the plan deliver?"
In those circumstances, the candidate site assessment appears to conflate two distinct questions: whether a new specific allocation is numerically required under RTS2, and whether an established quarry site should continue to be positively recognised and safeguarded in the Plan. Those questions are not the same. The former may currently be answered in the negative. The latter, in the case of Pant-y-Ffynnon Quarry, should plainly be answered in the affirmative.
4. National and local policy context
The wider policy and evidence framework supports a more positive treatment of Pant-y-Ffynnon Quarry than is reflected in the candidate site assessment.
PPW states that it is in the interests of the minerals industry that landbanks reflect "real possibilities for future mineral working" and adds that authorities should provide "a clear guide to where nonenergy mineral extraction is likely to be acceptable".
MTAN1 explains that development plans should identify "dormant reserves" separately and states that "A more realistic landbank assessment is the aim of this process" so that a more accurate picture emerges of reserves "that are likely to have real potential for future working". It also states that the future landbank should include land specifically allocated for the working of aggregates as an "extended landbank".
The SWRAWP RTS reinforces the point that reserve arithmetic is not the whole picture. It states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects, changes in planning policy, protected site designations or other permitting constraints. This is particularly relevant given the increasingly important role of NRW licensing and abstraction controls, including quarry dewatering considerations, which may mean that some reserves are no longer as readily available or economically viable as historic landbank figures imply. Accordingly, apparent reserve sufficiency in quantitative terms may overstate the extent of genuinely deliverable supply. SWRAWP also confirms that dormant reserves "must be counted separately".
The Deposit RLDP's own framework is consistent with that broader policy approach. The Plan safeguards known limestone resources and retains quarry buffer zones so that incompatible development does not prejudice mineral operations or future working. BP25 explains that the RLDP safeguards finite mineral resources for future generations and protects them from permanent development that could sterilise or hinder extraction.

The Plan also provides a detailed framework for sustainable mineral working, including new workings, extensions and the reworking or reopening of old workings. That mechanism is intended to deal with the detailed merits of mineral proposals, including environmental effects, amenity, hydrology, transport and restoration. There is therefore no sound policy basis for adopting an unduly negative position toward Pant-y-Ffynnon Quarry at plan-making stage simply because no fresh allocation is currently required.

5. Benefits of continued extraction at Pant-y-Ffynnon Quarry

Continued extraction at Pant-y-Ffynnon Quarry would give rise to a number of important site-specific and strategic benefits.

PPW expressly recognises the planning advantages of extending established quarry sites. Paragraph 5.14.48 states that "The presence of an existing quarry should be a material consideration when considering a proposal for an extension. There may be benefits to extending a site in terms of shared infrastructure, for instance, as opposed to working a new greenfield site." That principle is directly relevant to Pant-y-Ffynnon Quarry. The site is an existing quarrying location with an established operational and planning context, and any continued working or extension would be able to build upon that existing quarrying footprint, associated infrastructure and minerals land use relationship. In planning terms, that is materially preferable to directing future working to an entirely new greenfield location, and it reinforces the case for the Deposit RLDP to continue to recognise the site positively within the minerals strategy rather than treating it as strategically unimportant simply because no fresh allocation is currently required.

The site is an existing quarrying location with an established mineral planning history. Continued extraction would therefore amount to the continuation and proper management of an existing quarrying use rather than the introduction of mineral development into a wholly new location. That is a material land use consideration.

The candidate site statement identifies the effective use of mineral resources and the avoidance of sterilisation of unworked reserves as clear benefits of the proposal. That carries substantial weight. Mineral resources can only be worked where they occur, and it is generally more efficient and sustainable to make prudent use of an established quarry resource than to disregard it while pressure for future supply is directed elsewhere.

The site can also contribute to continuity and resilience of supply. The candidate site statement expressly states that continued quarrying at the wider site would provide continuity in mineral supply at this location and contribute to resilience through the provision of a consistent supply over the plan period and beyond. Existing operational or consented sites will often provide a more realistic and deliverable source of continuing supply than wholly new mineral sites.

Continued extraction would also support the construction industry through the provision of an adequate and continuous supply of minerals. This sits comfortably with BP25's recognition that the Vale is an "important supplier of Carboniferous limestone for general aggregate use" .

There are also local economic benefits. The candidate site submission refers to the maintenance of local economic benefits. An established quarrying operation supports employment, haulage, plant use, contractors and associated supply chains. Continued recognition of the site therefore supports local economic activity as well as mineral supply.

Environmental and restoration benefits are also relevant. The candidate site statement refers to benefits through new planting and habitat creation and treats restoration as part of the overall site concept. Continued quarrying should therefore not be considered solely in terms of extraction. It also creates the opportunity to secure restoration, habitat creation, landscape management and long-term after-use benefits through a modern planning framework.

A further important benefit is that any continued working would proceed under modern planning controls. The ROMP approval confirms that continued extraction has been reviewed through a contemporary planning process, that updated conditions now regulate the site, that the quarry must be worked in accordance with an approved working scheme, that annual production is capped at 250,000 tonnes, and that extraction may continue until 21 February 2042. That provides a robust and sustainable planning basis for future quarrying.

Continued recognition of Pant-y-Ffynnon Quarry within the Deposit RLDP would also ensure that the site remains properly integrated into the authority's safeguarding, buffer and minerals policy framework. That would provide clarity, consistency and transparency in the Plan.

6. Changes sought

The Deposit RLDP should not treat the absence of a current RTS2 requirement for further allocations as determinative of the planning treatment of Pant-y-Ffynnon Quarry.

The Plan should continue to recognise the consented quarry element positively within the minerals strategy.

The wider site should remain properly safeguarded within the minerals safeguarding and quarry buffer framework.

The supporting text should make clear that the absence of a new allocation reflects only the current RTS2 quantitative position and not any conclusion that the site is unsuitable in principle for continued quarrying.

The Plan should rely on its existing minerals development management policies, together with the ROMP framework and any future application process, to assess the detailed merits of continued working, associated development and restoration proposals at the site.

That approach would better reflect the site's planning status, the candidate site evidence, the ROMP determination and the wider objective of maintaining a sound and effective minerals strategy in the Vale of Glamorgan.

7. Conclusion

The Council's reliance on the statement that the 2nd Review of the Minerals Regional Technical Statement indicates that no further allocations are specifically required within the Vale of Glamorgan RLDP is too narrow a basis on which to assess Pant-y-Ffynnon Quarry.

That statement may explain why the Council has not identified a new formal mineral allocation on numerical grounds. It does not, however, justify removing or diluting positive recognition of an existing quarry site with an established planning status, a recent ROMP approval permitting continued extraction until 21 February 2042, and clear evidence of continuing supply, economic and restoration benefits.

Pant-y-Ffynnon Quarry should therefore continue to be positively recognised as part of the Vale of Glamorgan's minerals framework. The Deposit RLDP should distinguish clearly between the absence of a current need for a fresh allocation and the continuing strategic relevance of an established quarry site. In the case of Pant-y-Ffynnon Quarry, the latter plainly remains.

8. Summary

 Overall minerals strategy: Support in part / Object in part.

Seth Hill & Son Ltd supports the general objective of maintaining an adequate minerals supply and managing mineral resources through a plan-led framework. Objection is taken to the extent that the Deposit RLDP relies too narrowly on the RTS2 conclusion that no further allocations are specifically required, without properly reflecting the continuing role of Panty-Ffynnon Quarry as an existing quarry site with ongoing strategic relevance.

 Strategic minerals policy / supply and safeguarding approach: Support in part / Object in part.

The strategic objective of securing a continuous supply of minerals and safeguarding mineral resources is supported. Objection is taken insofar as that strategic approach is not properly applied to Pant-y-Ffynnon Quarry, which should continue to be recognised positively within the minerals framework notwithstanding the absence of a current need for a fresh allocation.

 Policy MIN1 – Mineral safeguarding areas: Support.

Support is given to the safeguarding of limestone resources from unnecessary sterilisation. That approach is directly relevant to Pant-y-Ffynnon Quarry, particularly given that the candidate site submission sought to retain quarry status for the consented element and to safeguard the wider site for longer-term quarrying.

 Policy MIN2 – Quarry buffer zones: Support.

The principle of retaining quarry buffer zones is supported because it protects existing and future quarrying operations from encroachment by incompatible development. Continued positive recognition of Pant-y-Ffynnon Quarry sits logically alongside that buffer framework.

 Policy MIN4 – Sustainable mineral working: Support in principle.

Support is given to the policy framework for new workings, extensions and continued mineral extraction subject to environmental safeguards, amenity protection and restoration. Pant-y-Ffynnon Quarry is capable of being assessed under that framework, and detailed issues should be dealt with through the policy and application process rather than by withholding positive plan recognition now.

 Candidate Site Assessment – Pant-y-Ffynnon Quarry: Object.

Objection is taken to the candidate site assessment insofar as it relies on the statement that no further allocations are specifically required under RTS2 as the reason for not taking the site forward positively. That reasoning is too narrow because it fails to engage with the fact that the site is an existing quarrying location, that the candidate submission sought retention of quarry status as well as longer-term safeguarding, and that the site has benefited from ROMP approval ref. 2024/00246/ENV, which permits operations until 21 February 2042.

 Status of the existing quarry site: Object to insufficient recognition.

Seth Hill & Son Ltd objects to any approach which treats Pant-y-Ffynnon Quarry as strategically unimportant simply because no new allocation is numerically required. The consented quarry element should continue to be positively recognised in the Plan, reflecting its existing planning status, updated ROMP conditions and ongoing minerals planning context.

 Benefits of continued extraction at Pant-y-Ffynnon Quarry: Positive material consideration.

Continued extraction would make productive use of an existing quarry site, avoid sterilisation of unworked reserves, provide continuity and resilience of mineral supply, support local economic benefits and allow restoration-led environmental gains through planting, habitat creation and long-term after-use. Those benefits weigh in favour of continued positive recognition of the site within the Deposit RLDP.

 Soundness and evidence base: Object to insufficiently evidence-led treatment.

The Development Plans Manual requires plans to be based on "robust evidence" so they can be delivered and links candidate sites directly to the soundness question "Will the plan deliver?" The current treatment of Pant-y-Ffynnon Quarry does not fully reflect the evidence
before the Council on the site's planning status, deliverability and continuing operational role.

 National policy compliance – PPW, MTAN1 and SWRAWP: Support in principle / Object to incomplete application.

The broad alignment of the Deposit RLDP with national minerals policy is supported. The objection is that the Plan does not go far enough in applying PPW's reference to "real possibilities for future mineral working", MTAN1's requirement for a "more realistic landbank assessment", and SWRAWP's warning that "Caution must be exercised in using these landbank figures" when considering the ongoing role of Pant-y-Ffynnon Quarry.
 Overall position: Support in part / Object in part.
In overall terms, Seth Hill & Son Ltd supports the Deposit RLDP's broad minerals framework. The objection is a focused one: the Plan should more clearly distinguish between the absence of a current need for a fresh mineral allocation and the continuing strategic relevance of Panty-Ffynnon Quarry as an established quarry site with planning status, ongoing supply potential and a recent ROMP approval extending operations beyond the plan period.

Change suggested by respondent:

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Sound: Not specified

Attachments:

Deposit Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3x9
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xb
Email Representation - https://valeofglamorgan.oc2.uk/a/3xc

7128 Support

Document Element: MIN2 - QUARRY BUFFER ZONES
Respondent: Tom Prichard (Holdings) Ltd [3738]
Agent: Highlight Planning

Summary:

The principle of protecting mineral operations from encroachment by incompatible development is supported.

Full text:

REPRESENTATIONS TO THE DEPOSIT VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036 ON BEHALF OF TOM PRICHARD (HOLDINGS) LTD

1. Introduction

These representations are submitted on behalf of Tom Prichard (Holdings) Ltd in respect of the Deposit Vale of Glamorgan Replacement Local Development Plan 2021–2036. They relate specifically to the Plan's minerals strategy and policy framework, the treatment of dormant mineral sites, and the candidate site assessment and supporting evidence relating to Argoed Isha Quarry, Llansannor.

The respondent supports the broad direction of the Deposit RLDP minerals framework, but contends that the Plan is unsound in part in the way it presently treats Argoed Isha Quarry. The central point is straightforward: the Council's own evidence accepts that usable reserves remain at the site, that those reserves could still be extracted if required, and that the site has the potential to be reworked. Yet that conclusion is not carried through into a sufficiently positive and coherent plan-led position.

The objection is therefore not to the principle of maintaining a minerals strategy founded on safeguarding, environmental protection and modern control of extraction. Nor is it suggested that the Plan must necessarily allocate Argoed Isha as a new specific site simply because a candidate site was submitted. Rather, the objection is that the Deposit RLDP does not properly reflect the evidential position it has itself reached. It acknowledges that Argoed Isha should not be made subject to a Prohibition Order, but stops short of recognising clearly that the site remains a dormant limestone quarry with continuing mineral significance, realistic future reactivation potential and scope for future working under modern planning controls, restoration obligations and biodiversity enhancement.

2. Site context and planning status

Argoed Isha is a long-established limestone quarry. The candidate site planning statement explains that the site has a historic quarry planning status, that recommencement would require updated working conditions, and that the site was promoted through the candidate site process precisely because there remains interest in recommencing mineral extraction. The same statement records the local planning authority's earlier position that, in relation to a previous proposal, the Council could only seek a Prohibition Order if it was satisfied that resumption of extraction was unlikely, but that "this requirement is not met" at Argoed Isha because of continuing interest in re-opening the quarry. It also records the mineral adviser's view that "The site currently has planning permission for a quarry" and that, absent relinquishment, "the permission to quarry remains valid".

The candidate site material also addresses availability and deliverability. It states that the site is available for development, that the proposal is considered viable and deliverable owing to the underlying need for the mineral, and that the site is a brownfield / underutilised site. It further notes that the proposal comprises mineral development within a mineral safeguarding area and within a site which benefits from a planning permission for quarrying, such that it is considered acceptable in principle. Those points are important because they show that Argoed Isha is not simply a theoretical reserve detached from any realistic prospect of future use.

3. Soundness and the role of evidence

The Development Plans Manual states that plans should be based on robust evidence so they can be delivered and that LPAs must be able to demonstrate, in broad terms, that the plan is deliverable with no significant impediments to implementation. It also emphasises the importance of a detailed candidate site process and of ensuring delivery and viability are embedded in that process from the outset. Elsewhere, the Manual explains that the plan-making process should prepare more effective, efficient and deliverable plans and refers expressly to the tests of soundness which must be satisfied if a development plan is to be recommended for adoption.

Those principles matter here because the Council had before it a candidate site submission which set out the site's planning status, constraints, deliverability and rationale for retention as a mineral site. It also had its own local evidence in BP25 and the wider regional evidence from RTS2, the sub-regional collaboration work and SWRAWP. In those circumstances, a sound plan ought to explain clearly how that evidence has informed the Council's chosen strategy for Argoed Isha. In the respondent's submission, the Deposit RLDP presently falls short because it recognises part of the evidence, but not its full implications. The Plan is therefore unsound in part because it is not fully justified by the evidence and is not as effective as it should be in setting out a coherent future approach to this dormant but still viable mineral resource.

4. National policy context – Planning Policy Wales

Planning Policy Wales establishes the national context for these representations. It requires planning authorities to maintain landbanks for non-energy minerals in demand and states that, for crushed rock, a minimum ten-year landbank should be maintained through the plan period unless agreement is reached for other authorities to make a compensating increase in provision. PPW also recognises that individual authority boundaries are not always an adequate basis for landbank policy where environmental constraints are too important or workable resources too limited, in which case authorities must agree a joint approach with neighbouring authorities in line with regional arrangements.

PPW is especially important in relation to inactive sites. Paragraph 5.14.17 provides that inactive sites with planning permission for future working which are considered unlikely to be reactivated should be identified in the development plan and should be the subject of a suitable strategy, which could include prohibition orders, restoration and aftercare proposals, and a suitable proposed after-use. Paragraph 5.14.18 then states that "It is in the interests of the minerals industry that landbanks reflect real possibilities for future mineral working" and adds that, where sites have been inactive and "there is no prospect of future working", authorities should consider the use of prohibition orders.

That distinction is central to the present case. The Council has not concluded that there is no prospect of future working at Argoed Isha. Quite the contrary: BP25 states that usable reserves remain at the site, that they could be extracted if required, and that they have the potential to be reworked. The logic of PPW is therefore that Argoed Isha is not a site to be treated as effectively closed or exhausted. It remains a site with continuing mineral relevance, albeit one that would require modern conditions and a fresh scheme of workings before any extraction could recommence.

PPW is also directly relevant to areas of future working. Paragraph 5.14.19 states that "Where necessary, planning authorities should provide a clear guide to where non-energy mineral extraction is likely to be acceptable" and that policies and proposals should cover mineral resources "which are currently used or which may need to be used in the foreseeable future". It further explains that such areas should be clearly identified on a proposals map and may take the form, in order of preference, of specific sites, preferred areas or areas of search.

The respondent does not suggest that PPW compels the Council to identify Argoed Isha as a specific site. However, PPW plainly supports a more positive and more explicit plan-led recognition of sites which retain real future mineral potential. Once the Council's own evidence accepts that Argoed Isha is such a site, it is difficult to reconcile a largely passive policy response with the national expectation that development plans should give a clear guide to where future mineral working may be acceptable.

5. National policy context – MTAN1

MTAN1 reinforces the need for a realistic and evidence-based approach to landbanks and dormant sites. It explains that a landbank is composed of permitted reserves at active and inactive sites, and that development plans should include an assessment of both the current and future landbank. Paragraph 47 then states that development plans should identify those sites that are dormant and count these as "dormant reserves" to be clearly shown in landbank calculations as a separate category. Paragraph 48 continues by stating that a more realistic approach is required, observing that extensive historic landbanks can perpetuate unsustainable supply patterns if left unaltered. MTAN1 therefore states that "A more realistic landbank assessment is the aim of this process" so that a more accurate picture is obtained of permitted reserves "that are likely to have real potential for future working".

That policy language is highly material. It confirms that dormant reserves are not irrelevant simply because they are not counted within the active landbank. They are to be identified separately and realistically assessed. That is precisely the position that should be taken with Argoed Isha. The Council has already undertaken the essential assessment in substance through BP25 and has concluded that usable reserves remain and that the site has the potential to be reworked. MTAN1 therefore supports a more nuanced and more positive treatment of the site than a simple "no allocation required" conclusion.

MTAN1 also recognises that in some authorities it may not be possible or acceptable to provide an

adequate current or extended landbank because of environmental designations, limited suitable resources, or amenity considerations, and that RAWPs should consider the environmental capacity of authorities to supply aggregates. This is an important reminder that reserve arithmetic is not the only issue. Deliverability, environmental capacity, and the practical availability of reserves remain relevant.

6. Apportionment and Plan Period

The regional and sub-regional evidence does not undermine the respondent's case. It explains why there is no present quantitative requirement for a further minerals allocation in the Vale, but it does not justify a negative or dismissive treatment of Argoed Isha.

BP25 records the RTS2 and Statement of Sub-Regional Collaboration position for the Cardiff City subregion. Table 5 identifies the Vale of Glamorgan apportionment for crushed rock as 17.05 million tonnes over 25 years, with existing permitted reserves of 18.73 million tonnes at the end of 2016 and a minimum allocation needed of 0, alongside 13 million tonnes of additional reserves at dormant sites. BP25 then states that, based on those figures, the SSRC identifies that the Vale of Glamorgan does not require any allocations for future workings of crushed rock to be identified within the RLDP.

Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.

On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.

Based on the current timetable, an end date of 2038 (with associated review of mineral reserves) would therefore ensure a sound plan.

Notwithstanding our comment in respect of the Plan Period, we remain concerned of how the Plan should treat a dormant site which the Council accepts has remaining usable reserves and realistic reactivation potential. Nor does it justify treating Argoed Isha as though it lacked future significance.

The respondent's case is therefore not that the RTS2 figure is wrong, but that it has been taken too far. A conclusion that no additional formal allocation is presently required is not the same thing as a conclusion that the site has no future role.

7. BP25 – the Council's own minerals evidence

BP25 is the most important local evidence document for present purposes. It records that the Vale of Glamorgan is an "important supplier of Carboniferous limestone for general aggregate use". It then addresses dormant mineral sites in the Vale. Paragraphs 5.48 to 5.50 explain that many dormant sites have not been worked for many years and are considered unlikely to be worked in the future; accordingly, the Council intends to serve Prohibition Orders on those sites, which would provide certainty for nearby residents and remove reserves which are not realistically available. BP25 also explains that the level of reserves at dormant sites is not counted in the landbank.

Crucially, BP25 then distinguishes Argoed Isha from that general class of dormant sites. Paragraph 5.51 states: "While Argoed Isha quarry is classified as 'dormant', useable reserves remain at the site and could be extracted if required." It goes on to record that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030, but then adds: "While the reserves at the site are not included in the current landbank, they have the potential to be reworked and therefore a Prohibition Order will not be served at Argoed Isha Quarry until the current circumstances change."

That is a very clear evidential conclusion. BP25 does not simply refrain from prohibiting the site without explanation. It positively explains why Argoed Isha is different: usable reserves remain, they could be extracted if required, and they have the potential to be reworked. In the respondent's submission, that conclusion requires a correspondingly clearer and more positive policy response within the Deposit RLDP than is presently provided.

BP25 is also supportive on restoration and aftercare. It states that the serving of Prohibition Orders is intended to provide certainty and, where necessary, restoration of sites may be sought. More broadly, the background paper recognises the importance of sustainable minerals management and balancing mineral extraction with environmental protection and community well-being. That policy background is entirely consistent with the respondent's case that any future working at Argoed Isha should be controlled through a modern framework of environmental safeguards and restoration-led after-use.

8. SWRAWP Annual Report 2024

The SWRAWP Annual Report 2024 is also highly relevant because it warns against over-reliance on headline landbank figures. Paragraph 4.10 states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects that may restrict the availability of certain reserves, nor constraints arising from changes in planning policy, protected site designation or other non-planning permitting requirements. Paragraph 4.11 then confirms that dormant sites have not been included in landbank calculations and that local planning authorities should carry out their own assessments of the likelihood of reactivation, but that in any event "dormant reserves must be counted separately".

That evidence materially supports the respondent's case. It shows that the statement "no further

allocations are specifically required" is not, in itself, the end of the analysis. Landbank figures are a starting point, but they do not tell the whole story. Questions of practical availability, regulatory and environmental constraints elsewhere, and the separate role of dormant reserves remain relevant. Argoed Isha therefore retains importance as part of the broader mineral resource picture even though it is not part of the active landbank.

9. Response to the Council's candidate site assessment

The Council's candidate site assessment records that a positive allocation for mineral working is not included because "the 2nd Review of the Minerals Regional Technical Statement indicates no further allocations are specifically required to be identified within the Vale of Glamorgan RLDP". That point should be addressed directly.

The respondent accepts that the RTS2 position explains why the Council may have concluded that there is no immediate need for a fresh mineral allocation in quantitative terms. However, that is not a sufficient reason, on its own, to reject a more positive policy treatment of Argoed Isha or to give the impression that the site lacks future significance. BP25 itself shows why. It records both that the Vale does not presently require additional allocations and, separately, that Argoed Isha retains remaining usable reserves and has the potential to be reworked. Those two propositions are not inconsistent. They point toward a more nuanced and more accurate conclusion: namely, that Argoed Isha may not need to be allocated now to meet a current numerical shortfall, but it remains a dormant limestone reserve of continuing strategic relevance that should be positively recognised within the Plan.

That approach is also supported by PPW, MTAN1 and SWRAWP. PPW states that landbanks should reflect "real possibilities for future mineral working" and that prohibition orders are appropriate where there is "no prospect of future working". MTAN1 requires dormant reserves to be separately identified and assessed so as to achieve "A more realistic landbank assessment". SWRAWP says that "Caution must be exercised" in using landbank figures and that dormant reserves must be counted separately. Those documents all point to a need for a broader planning judgment than simple reserve arithmetic.

Accordingly, the flaw in the candidate site reasoning is not that it refers to the RTS2 position, but that it appears to stop there. In the respondent's submission, the sounder and more evidence-based approach would have been either to give the site more positive recognition in the Plan's supporting text, or at the very least to make clear that the site was not allocated because no immediate additional allocation was required, not because the site lacked merit, availability or future potential.

Moreover, SWRAWP reinforces the point that reserve arithmetic is not the whole picture. It states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects, changes in planning policy, protected site designations or other permitting constraints. This is particularly relevant given the increasingly important role of NRW licensing and abstraction controls, including quarry dewatering considerations, which may mean that some reserves are no longer as readily available or economically viable as historic landbank figures imply. Accordingly, apparent reserve sufficiency in quantitative terms may overstate the extent of genuinely deliverable supply.

10. The existing temporary training permission does not sterilise the reserve

BP25 states that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030. The significance of that point is not that the site has permanently moved away from minerals. The significance is the opposite: BP25 records the temporary training use while simultaneously concluding that usable reserves remain and may be reworked, and that a Prohibition Order should therefore not be served.

In planning terms, a temporary training use of this kind cannot properly be treated as sterilising the mineral reserve. PPW's safeguarding policy is concerned with preventing sterilisation by permanent development. A time-limited interim use, particularly one expressly acknowledged in BP25 as coexisting with a potentially reworkable reserve, does not extinguish the underlying mineral significance of the site. The temporary training use should therefore be understood as an interim overlay rather than a permanent change in land use character.

11. Benefits of continued extraction at Argoed Isha Quarry

Continued extraction at Argoed Isha Quarry would give rise to a number of site-specific and strategic benefits which the Deposit RLDP should recognise when considering the future role of the site.

The site is not a greenfield mineral proposal on an entirely undeveloped site. It is an existing quarry with a long-established mineral planning history and extant mineral status in principle, subject to updated modern conditions. The principle of mineral working at the site is therefore already established in land use terms, and the future reworking of the reserve would represent the continuation of an existing mineral use rather than the introduction of quarrying into a wholly new location. That is a material distinction when considering the appropriateness of retaining the site as a realistic future mineral resource.

Continued extraction would also assist in making use of a proven local limestone resource in the Vale of Glamorgan, rather than forcing greater reliance on more distant or more constrained sources. BP25 confirms that the Vale is an "important supplier of Carboniferous limestone for general aggregate use". In practical terms, continued extraction at Argoed Isha would accord with the proximity principle by helping to meet demand from a comparatively well-located source close to markets in the Vale and wider Cardiff area, rather than depending unduly on more remote sources or on supply patterns that may become more constrained over time.

The site would also contribute to the resilience and flexibility of the wider minerals supply position.

Even if no immediate additional allocation is numerically required under RTS2, national and regional policy make clear that landbank figures are not the only relevant consideration. A dormant quarry with remaining usable reserves provides contingency, flexibility and productive capacity in the event that supply circumstances change during the plan period. This is especially important where SWRAWP warns that landbank figures do not capture geographical, operational, policy or other permitting constraints, and where MTAN1 requires a realistic view of reserves with future potential. Argoed Isha therefore has value not merely as a theoretical reserve, but as part of a resilient longer-term supply position.

Continued extraction at Argoed Isha would also support local supply chains and a more diverse quarrying sector. The candidate site submission identified the benefit of maintaining provision from a range of operators, including smaller and medium-sized businesses, rather than relying only on a limited number of larger established sites. In planning terms, that diversity is relevant to continuity of supply, competition, responsiveness to local demand and the overall resilience of the minerals sector in the Vale and wider region.

A further benefit is that any future extraction would be carried out under modern planning control rather than being left sterilised or underused. If the site is reworked in future, that would necessarily be through a fresh scheme of modern conditions and under the policy framework of the RLDP and national minerals policy. Issues such as traffic, hydrology, hydrogeology, ecology, landscape, amenity, blasting, dust, restoration and long-term aftercare would all be capable of being addressed through a contemporary planning and environmental control regime. That is an important benefit in itself, because it means any future extraction would not take place under outdated historic controls, but under a modern framework designed to secure sustainable mineral working.

Continued extraction would also create the opportunity for a comprehensive restoration and aftercare strategy delivering environmental gains. PPW recognises that restoration and aftercare proposals for inactive sites may include natural re-vegetation for nature conservation and ecological interests. BP25 records that restoration may be sought where necessary. In practice, any future extraction proposal at Argoed Isha could be accompanied by a restoration-led scheme involving landform improvement, habitat creation, ecological enhancement and long-term stewardship. The site should therefore not be seen simply as a mineral reserve, but as a place where carefully managed extraction could unlock biodiversity, landscape and geodiversity benefits over time.

The site also represents the productive use of an underutilised brownfield quarry. The candidate site material identifies it as a brownfield / underutilised site. In land use terms, there is a clear logic in making effective use of an existing quarried landscape with established mineral status, rather than placing additional pressure on wholly undeveloped land elsewhere. In this case, the Council's own evidence confirms the key factor: usable reserves remain and the site has the potential to be reworked.

There is finally a longer-term safeguarding benefit in recognising the case for continued extraction. PPW requires mineral resources to be safeguarded to prevent sterilisation by permanent development, and makes clear that landbanks should reflect "real possibilities for future mineral working". Positive recognition of the benefits of continued extraction at Argoed Isha is therefore entirely consistent with the basic objectives of national minerals policy: prudent use of finite mineral resources, maintenance of flexibility in supply, and avoidance of circumstances in which sites with genuine future potential are prematurely written off.

12. Restoration, aftercare and biodiversity gain

The respondent's case is not simply that Argoed Isha should be recognised as a future mineral source. It is also that any future reworking can and should be subject to a modern restoration-led scheme capable of securing environmental gains.

PPW contemplates restoration and aftercare proposals for inactive sites, including natural revegetation for nature conservation and ecological interests. BP25 records that, where necessary, restoration may be sought at dormant sites. The candidate site material also identifies that the site is not close to internationally or nationally important wildlife sites, while noting the presence of existing ecological and geological interests that could be appropriately managed through buffers, mitigation and future planning controls. These are precisely the kinds of circumstances in which a carefully designed extraction and restoration scheme could deliver meaningful biodiversity and geodiversity benefits alongside the prudent working of the remaining mineral resource.

Future working at Argoed Isha should therefore not be viewed in binary opposition to environmental enhancement. The modern policy framework envisages integrated mineral development in which extraction, restoration and aftercare are part of a single coherent process. That is an additional reason why the Plan should positively recognise the site's continuing potential rather than leaving it in a policy grey area.

13. Overall conclusion

The evidence base points clearly to a more positive and more coherent treatment of Argoed Isha than is presently provided in the Deposit RLDP.

PPW says that landbanks should reflect "real possibilities for future mineral working" and that prohibition orders are appropriate where there is "no prospect of future working". MTAN1 requires a separate assessment of "dormant reserves" and seeks "A more realistic landbank assessment". SWRAWP states that "Caution must be exercised in using these landbank figures". BP25 records that "useable reserves remain at the site and could be extracted if required" and that they "have the

potential to be reworked". The Development Plans Manual requires plans to be based on robust evidence and to be deliverable.
Against that background, the Council's reliance on the proposition that the RTS2 indicates no further allocations are specifically required does not dispose of the issue. It may explain why there is no immediate need for a fresh mineral allocation, but it does not justify a passive or dismissive treatment of Argoed Isha. The more sound and evidence-based approach is to recognise that, whilst no additional formal allocation is presently required, Argoed Isha remains a dormant limestone quarry with usable reserves and realistic future reactivation potential, capable of coming forward in future under modern policies for sustainable working, restoration and aftercare.
14. Summary
These representations contend that, whilst the Deposit RLDP minerals strategy is broadly supported, the Plan is unsound in part in its treatment of Argoed Isha Quarry. In particular, the objection goes principally to whether the Plan is justified by the evidence and whether it is effective in delivery. The objection also concerns consistency with national minerals policy to the extent that the Deposit RLDP does not fully reflect PPW and MTAN1 in positively planning for the safeguarding and potential future working of this identified limestone resource.
 Strategic Policy SP18 – Minerals Supply and Safeguarding: Support in part / Object in part.
The respondent supports the overarching strategy of maintaining a continuous supply of minerals, safeguarding mineral resources and avoiding sterilisation. However, objection is taken insofar as the strategy does not carry through the Council's own evidence that Argoed Isha retains usable reserves and future potential for reworking.
 Policy MIN1 – Mineral Safeguarding Areas: Support.
This policy is supported because it reflects national policy by safeguarding limestone resources from permanent development that would sterilise them or hinder future extraction.
That approach is directly relevant to Argoed Isha, which remains a safeguarded resource with extant mineral significance.
 Policy MIN2 – Quarry Buffer Zones: Support.
The principle of protecting mineral operations from encroachment by incompatible development is supported. If Argoed Isha is to remain a realistic future source of limestone, the Plan should continue to avoid prejudice to its potential reactivation.
 Policy MIN3 – Dormant Mineral Sites: Support in principle / Object in part.
The respondent supports the Council's decision not to serve a Prohibition Order at Argoed Isha. That is plainly the correct approach because BP25 confirms that usable reserves remain and may be reworked. However, objection is taken to the absence of stronger wording recognising that the site remains a realistic future source of limestone.
 Policy MIN4 – Sustainable Mineral Working: Support in principle.
The respondent supports the policy framework for future reworking or reopening of old workings, including the need for acceptable impacts, restoration and beneficial after-use. Argoed Isha is capable of being assessed under that type of modern policy framework.
 Supporting text to the dormant quarry provisions / paragraph 6.386 equivalent approach: Object in part.
The Plan is correct to recognise that the reserves at Argoed Isha could be reworked in future. The objection is that this conclusion is not carried through into a fuller and more positive policy narrative.
 Plan Period: Object.
Amend in line with the Development Plans Manual such that there are at least 10 years remaining at adoption.
 Candidate Site 411 – Argoed Isha Quarry: Object.
The respondent objects to the candidate site assessment insofar as the site appears to have been rejected solely or mainly because RTS2 indicates that no further allocations are specifically required. That is too narrow an approach and does not properly reflect PPW, MTAN1, SWRAWP or BP25's conclusion that usable reserves remain and may be reworked.
 Minerals Background Paper BP25: Support in part / Object in part.
BP25 is supported where it correctly records that Argoed Isha is dormant, that usable reserves remain, and that the site has the potential to be reworked. Objection is taken only insofar as the Deposit RLDP does not fully reflect the implications of that evidence in a more positive and coherent plan-led position.
 Temporary training use: Clarificatory comment in support of the representation.
The current training use does not sterilise the limestone reserve. BP25 records the temporary training use until 2030 while also confirming that usable reserves remain and that the site may be reworked. It should therefore be treated as an interim use only.
 Benefits of continued extraction at Argoed Isha: Positive material consideration.
Continued extraction at Argoed Isha would make productive use of an existing dormant quarry with remaining usable reserves, support local and sub-regional limestone supply from a Vale source, contribute to flexibility and resilience in the minerals strategy, and enable future working to proceed under modern planning controls with restoration, aftercare and biodiversity enhancement.
 Overall position on the Deposit RLDP minerals strategy: Support in part / Object in part.

In overall terms, the respondent supports the Deposit RLDP's general minerals framework.
The objection is a precise and limited one: the Plan should more clearly and positively recognise Argoed Isha as a dormant quarry with usable reserves, realistic reactivation
potential, and scope for a future scheme of continued extraction and restoration, such that the Plan is properly justified by its evidence base and effective in delivering a resilient minerals strategy over the plan period.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3j3
Email Representation - https://valeofglamorgan.oc2.uk/a/3j4

4822 Object

Document Element: MIN3 - DORMANT MINERAL SITES
Respondent: Mr Rob G Thomas [683]

Summary:

Longlands Quarry
Quarry site and quarry buffer zone

Intrusion into open countryside
Impact on visual amenities
Impact on traffic and highways
Increased noise
Increase dust
Impact on local properties
Loss of good agricultural land under ALC Wales Predictive Map and BMV land loss
Industrialisation of the countryside

Full text:

MIN2/MIN3
Longlands Quarry
Quarry Site and Quarry Buffer Zone
7.8 ha currently
44.1 ha RLDP buffer zone expansion

Intrusion into open countryside
Impact on visual amenities
Impact on traffic and highways
Increased noise
Increase dust
Impact on local properties
Loss of good agricultural land under ALC Wales Predictive Map and BMV land loss
Industrialisation of the countryside

Change suggested by respondent:

-

Sound: Not specified
Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/sf9

7129 Support

Document Element: MIN3 - DORMANT MINERAL SITES
Respondent: Tom Prichard (Holdings) Ltd [3738]
Agent: Highlight Planning

Summary:

The respondent supports the Council's decision not to serve a Prohibition Order at Argoed Isha. That is plainly the correct approach because BP25 confirms that usable reserves remain and may be reworked.

Full text:

REPRESENTATIONS TO THE DEPOSIT VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036 ON BEHALF OF TOM PRICHARD (HOLDINGS) LTD
1. Introduction
These representations are submitted on behalf of Tom Prichard (Holdings) Ltd in respect of the Deposit Vale of Glamorgan Replacement Local Development Plan 2021–2036. They relate specifically to the Plan's minerals strategy and policy framework, the treatment of dormant mineral sites, and the candidate site assessment and supporting evidence relating to Argoed Isha Quarry, Llansannor.
The respondent supports the broad direction of the Deposit RLDP minerals framework, but contends that the Plan is unsound in part in the way it presently treats Argoed Isha Quarry. The central point is straightforward: the Council's own evidence accepts that usable reserves remain at the site, that those reserves could still be extracted if required, and that the site has the potential to be reworked. Yet that conclusion is not carried through into a sufficiently positive and coherent plan-led position.
The objection is therefore not to the principle of maintaining a minerals strategy founded on safeguarding, environmental protection and modern control of extraction. Nor is it suggested that the Plan must necessarily allocate Argoed Isha as a new specific site simply because a candidate site was submitted. Rather, the objection is that the Deposit RLDP does not properly reflect the evidential position it has itself reached. It acknowledges that Argoed Isha should not be made subject to a Prohibition Order, but stops short of recognising clearly that the site remains a dormant limestone

quarry with continuing mineral significance, realistic future reactivation potential and scope for future working under modern planning controls, restoration obligations and biodiversity enhancement.

2. Site context and planning status

Argoed Isha is a long-established limestone quarry. The candidate site planning statement explains that the site has a historic quarry planning status, that recommencement would require updated working conditions, and that the site was promoted through the candidate site process precisely because there remains interest in recommencing mineral extraction. The same statement records the local planning authority's earlier position that, in relation to a previous proposal, the Council could only seek a Prohibition Order if it was satisfied that resumption of extraction was unlikely, but that "this requirement is not met" at Argoed Isha because of continuing interest in re-opening the quarry. It also records the mineral adviser's view that "The site currently has planning permission for a quarry" and that, absent relinquishment, "the permission to quarry remains valid".

The candidate site material also addresses availability and deliverability. It states that the site is available for development, that the proposal is considered viable and deliverable owing to the underlying need for the mineral, and that the site is a brownfield / underutilised site. It further notes that the proposal comprises mineral development within a mineral safeguarding area and within a site which benefits from a planning permission for quarrying, such that it is considered acceptable in principle. Those points are important because they show that Argoed Isha is not simply a theoretical reserve detached from any realistic prospect of future use.

3. Soundness and the role of evidence

The Development Plans Manual states that plans should be based on robust evidence so they can be delivered and that LPAs must be able to demonstrate, in broad terms, that the plan is deliverable with no significant impediments to implementation. It also emphasises the importance of a detailed candidate site process and of ensuring delivery and viability are embedded in that process from the outset. Elsewhere, the Manual explains that the plan-making process should prepare more effective, efficient and deliverable plans and refers expressly to the tests of soundness which must be satisfied if a development plan is to be recommended for adoption.

Those principles matter here because the Council had before it a candidate site submission which set out the site's planning status, constraints, deliverability and rationale for retention as a mineral site. It also had its own local evidence in BP25 and the wider regional evidence from RTS2, the sub-regional collaboration work and SWRAWP. In those circumstances, a sound plan ought to explain clearly how that evidence has informed the Council's chosen strategy for Argoed Isha. In the respondent's submission, the Deposit RLDP presently falls short because it recognises part of the evidence, but not its full implications. The Plan is therefore unsound in part because it is not fully justified by the evidence and is not as effective as it should be in setting out a coherent future approach to this dormant but still viable mineral resource.

4. National policy context – Planning Policy Wales

Planning Policy Wales establishes the national context for these representations. It requires planning authorities to maintain landbanks for non-energy minerals in demand and states that, for crushed rock, a minimum ten-year landbank should be maintained through the plan period unless agreement is reached for other authorities to make a compensating increase in provision. PPW also recognises that individual authority boundaries are not always an adequate basis for landbank policy where environmental constraints are too important or workable resources too limited, in which case authorities must agree a joint approach with neighbouring authorities in line with regional arrangements.

PPW is especially important in relation to inactive sites. Paragraph 5.14.17 provides that inactive sites with planning permission for future working which are considered unlikely to be reactivated should be identified in the development plan and should be the subject of a suitable strategy, which could include prohibition orders, restoration and aftercare proposals, and a suitable proposed after-use. Paragraph 5.14.18 then states that "It is in the interests of the minerals industry that landbanks reflect real possibilities for future mineral working" and adds that, where sites have been inactive and "there is no prospect of future working", authorities should consider the use of prohibition orders.

That distinction is central to the present case. The Council has not concluded that there is no prospect of future working at Argoed Isha. Quite the contrary: BP25 states that usable reserves remain at the site, that they could be extracted if required, and that they have the potential to be reworked. The logic of PPW is therefore that Argoed Isha is not a site to be treated as effectively closed or exhausted. It remains a site with continuing mineral relevance, albeit one that would require modern conditions and a fresh scheme of workings before any extraction could recommence.

PPW is also directly relevant to areas of future working. Paragraph 5.14.19 states that "Where necessary, planning authorities should provide a clear guide to where non-energy mineral extraction is likely to be acceptable" and that policies and proposals should cover mineral resources "which are currently used or which may need to be used in the foreseeable future". It further explains that such areas should be clearly identified on a proposals map and may take the form, in order of preference, of specific sites, preferred areas or areas of search.

The respondent does not suggest that PPW compels the Council to identify Argoed Isha as a specific site. However, PPW plainly supports a more positive and more explicit plan-led recognition of sites which retain real future mineral potential. Once the Council's own evidence accepts that Argoed Isha is such a site, it is difficult to reconcile a largely passive policy response with the national expectation

that development plans should give a clear guide to where future mineral working may be acceptable.
5. National policy context – MTAN1
MTAN1 reinforces the need for a realistic and evidence-based approach to landbanks and dormant sites. It explains that a landbank is composed of permitted reserves at active and inactive sites, and that development plans should include an assessment of both the current and future landbank. Paragraph 47 then states that development plans should identify those sites that are dormant and count these as "dormant reserves" to be clearly shown in landbank calculations as a separate category. Paragraph 48 continues by stating that a more realistic approach is required, observing that extensive historic landbanks can perpetuate unsustainable supply patterns if left unaltered. MTAN1 therefore states that "A more realistic landbank assessment is the aim of this process" so that a more accurate picture is obtained of permitted reserves "that are likely to have real potential for future working".
That policy language is highly material. It confirms that dormant reserves are not irrelevant simply because they are not counted within the active landbank. They are to be identified separately and realistically assessed. That is precisely the position that should be taken with Argoed Isha. The Council has already undertaken the essential assessment in substance through BP25 and has concluded that usable reserves remain and that the site has the potential to be reworked. MTAN1 therefore supports a more nuanced and more positive treatment of the site than a simple "no allocation required" conclusion.
MTAN1 also recognises that in some authorities it may not be possible or acceptable to provide an adequate current or extended landbank because of environmental designations, limited suitable resources, or amenity considerations, and that RAWPs should consider the environmental capacity of authorities to supply aggregates. This is an important reminder that reserve arithmetic is not the only issue. Deliverability, environmental capacity, and the practical availability of reserves remain relevant.
6. Apportionment and Plan Period
The regional and sub-regional evidence does not undermine the respondent's case. It explains why there is no present quantitative requirement for a further minerals allocation in the Vale, but it does not justify a negative or dismissive treatment of Argoed Isha.
BP25 records the RTS2 and Statement of Sub-Regional Collaboration position for the Cardiff City subregion. Table 5 identifies the Vale of Glamorgan apportionment for crushed rock as 17.05 million tonnes over 25 years, with existing permitted reserves of 18.73 million tonnes at the end of 2016 and a minimum allocation needed of 0, alongside 13 million tonnes of additional reserves at dormant sites. BP25 then states that, based on those figures, the SSRC identifies that the Vale of Glamorgan does not require any allocations for future workings of crushed rock to be identified within the RLDP.
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council's current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated review of mineral reserves) would therefore ensure a sound plan.
Notwithstanding our comment in respect of the Plan Period, we remain concerned of how the Plan should treat a dormant site which the Council accepts has remaining usable reserves and realistic reactivation potential. Nor does it justify treating Argoed Isha as though it lacked future significance. The respondent's case is therefore not that the RTS2 figure is wrong, but that it has been taken too far. A conclusion that no additional formal allocation is presently required is not the same thing as a conclusion that the site has no future role.
7. BP25 – the Council's own minerals evidence
BP25 is the most important local evidence document for present purposes. It records that the Vale of Glamorgan is an "important supplier of Carboniferous limestone for general aggregate use". It then addresses dormant mineral sites in the Vale. Paragraphs 5.48 to 5.50 explain that many dormant sites have not been worked for many years and are considered unlikely to be worked in the future; accordingly, the Council intends to serve Prohibition Orders on those sites, which would provide certainty for nearby residents and remove reserves which are not realistically available. BP25 also explains that the level of reserves at dormant sites is not counted in the landbank.
Crucially, BP25 then distinguishes Argoed Isha from that general class of dormant sites. Paragraph 5.51 states: "While Argoed Isha quarry is classified as 'dormant', useable reserves remain at the site and could be extracted if required." It goes on to record that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030, but then adds: "While the reserves at the site are not included in the current landbank, they have the potential to be reworked and therefore a Prohibition Order will not be served at Argoed Isha Quarry until the current circumstances change."
That is a very clear evidential conclusion. BP25 does not simply refrain from prohibiting the site without explanation. It positively explains why Argoed Isha is different: usable reserves remain, they

could be extracted if required, and they have the potential to be reworked. In the respondent's submission, that conclusion requires a correspondingly clearer and more positive policy response within the Deposit RLDP than is presently provided.

BP25 is also supportive on restoration and aftercare. It states that the serving of Prohibition Orders is intended to provide certainty and, where necessary, restoration of sites may be sought. More broadly, the background paper recognises the importance of sustainable minerals management and balancing mineral extraction with environmental protection and community well-being. That policy background is entirely consistent with the respondent's case that any future working at Argoed Isha should be controlled through a modern framework of environmental safeguards and restoration-led after-use.

8. SWRAWP Annual Report 2024

The SWRAWP Annual Report 2024 is also highly relevant because it warns against over-reliance on headline landbank figures. Paragraph 4.10 states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects that may restrict the availability of certain reserves, nor constraints arising from changes in planning policy, protected site designation or other non-planning permitting requirements. Paragraph 4.11 then confirms that dormant sites have not been included in landbank calculations and that local planning authorities should carry out their own assessments of the likelihood of reactivation, but that in any event "dormant reserves must be counted separately".

That evidence materially supports the respondent's case. It shows that the statement "no further allocations are specifically required" is not, in itself, the end of the analysis. Landbank figures are a starting point, but they do not tell the whole story. Questions of practical availability, regulatory and environmental constraints elsewhere, and the separate role of dormant reserves remain relevant. Argoed Isha therefore retains importance as part of the broader mineral resource picture even though it is not part of the active landbank.

9. Response to the Council's candidate site assessment

The Council's candidate site assessment records that a positive allocation for mineral working is not included because "the 2nd Review of the Minerals Regional Technical Statement indicates no further allocations are specifically required to be identified within the Vale of Glamorgan RLDP". That point should be addressed directly.

The respondent accepts that the RTS2 position explains why the Council may have concluded that there is no immediate need for a fresh mineral allocation in quantitative terms. However, that is not a sufficient reason, on its own, to reject a more positive policy treatment of Argoed Isha or to give the impression that the site lacks future significance. BP25 itself shows why. It records both that the Vale does not presently require additional allocations and, separately, that Argoed Isha retains remaining usable reserves and has the potential to be reworked. Those two propositions are not inconsistent. They point toward a more nuanced and more accurate conclusion: namely, that Argoed Isha may not need to be allocated now to meet a current numerical shortfall, but it remains a dormant limestone
reserve of continuing strategic relevance that should be positively recognised within the Plan.

That approach is also supported by PPW, MTAN1 and SWRAWP. PPW states that landbanks should reflect "real possibilities for future mineral working" and that prohibition orders are appropriate where there is "no prospect of future working". MTAN1 requires dormant reserves to be separately identified and assessed so as to achieve "A more realistic landbank assessment". SWRAWP says that "Caution must be exercised" in using landbank figures and that dormant reserves must be counted separately. Those documents all point to a need for a broader planning judgment than simple reserve arithmetic.

Accordingly, the flaw in the candidate site reasoning is not that it refers to the RTS2 position, but that it appears to stop there. In the respondent's submission, the sounder and more evidence-based approach would have been either to give the site more positive recognition in the Plan's supporting text, or at the very least to make clear that the site was not allocated because no immediate additional allocation was required, not because the site lacked merit, availability or future potential.

Moreover, SWRAWP reinforces the point that reserve arithmetic is not the whole picture. It states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects, changes in planning policy, protected site designations or other permitting constraints. This is particularly relevant given the increasingly important role of NRW licensing and abstraction controls, including quarry dewatering considerations, which may mean that some reserves are no longer as readily available or economically viable as historic landbank figures imply. Accordingly, apparent reserve sufficiency in quantitative terms may overstate the extent of genuinely deliverable supply.

10. The existing temporary training permission does not sterilise the reserve

BP25 states that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030. The significance of that point is not that the site has permanently moved away from minerals. The significance is the opposite: BP25 records the temporary training use while simultaneously concluding that usable reserves remain and may be reworked, and that a Prohibition Order should therefore not be served.

In planning terms, a temporary training use of this kind cannot properly be treated as sterilising the mineral reserve. PPW's safeguarding policy is concerned with preventing sterilisation by permanent development. A time-limited interim use, particularly one expressly acknowledged in BP25 as coexisting with a potentially reworkable reserve, does not extinguish the underlying mineral significance

of the site. The temporary training use should therefore be understood as an interim overlay rather than a permanent change in land use character.

11. Benefits of continued extraction at Argoed Isha Quarry

Continued extraction at Argoed Isha Quarry would give rise to a number of site-specific and strategic benefits which the Deposit RLDP should recognise when considering the future role of the site.

The site is not a greenfield mineral proposal on an entirely undeveloped site. It is an existing quarry with a long-established mineral planning history and extant mineral status in principle, subject to updated modern conditions. The principle of mineral working at the site is therefore already established in land use terms, and the future reworking of the reserve would represent the continuation of an existing mineral use rather than the introduction of quarrying into a wholly new location. That is a material distinction when considering the appropriateness of retaining the site as a realistic future mineral resource.

Continued extraction would also assist in making use of a proven local limestone resource in the Vale of Glamorgan, rather than forcing greater reliance on more distant or more constrained sources. BP25 confirms that the Vale is an “important supplier of Carboniferous limestone for general aggregate use”. In practical terms, continued extraction at Argoed Isha would accord with the proximity principle by helping to meet demand from a comparatively well-located source close to markets in the Vale and wider Cardiff area, rather than depending unduly on more remote sources or on supply patterns that may become more constrained over time.

The site would also contribute to the resilience and flexibility of the wider minerals supply position. Even if no immediate additional allocation is numerically required under RTS2, national and regional policy make clear that landbank figures are not the only relevant consideration. A dormant quarry with remaining usable reserves provides contingency, flexibility and productive capacity in the event that supply circumstances change during the plan period. This is especially important where SWRAWP warns that landbank figures do not capture geographical, operational, policy or other permitting constraints, and where MTAN1 requires a realistic view of reserves with future potential. Argoed Isha therefore has value not merely as a theoretical reserve, but as part of a resilient longer-term supply position.

Continued extraction at Argoed Isha would also support local supply chains and a more diverse quarrying sector. The candidate site submission identified the benefit of maintaining provision from a range of operators, including smaller and medium-sized businesses, rather than relying only on a limited number of larger established sites. In planning terms, that diversity is relevant to continuity of supply, competition, responsiveness to local demand and the overall resilience of the minerals sector in the Vale and wider region.

A further benefit is that any future extraction would be carried out under modern planning control rather than being left sterilised or underused. If the site is reworked in future, that would necessarily be through a fresh scheme of modern conditions and under the policy framework of the RLDP and national minerals policy. Issues such as traffic, hydrology, hydrogeology, ecology, landscape, amenity, blasting, dust, restoration and long-term aftercare would all be capable of being addressed through a contemporary planning and environmental control regime. That is an important benefit in itself, because it means any future extraction would not take place under outdated historic controls, but under a modern framework designed to secure sustainable mineral working.

Continued extraction would also create the opportunity for a comprehensive restoration and aftercare strategy delivering environmental gains. PPW recognises that restoration and aftercare proposals for inactive sites may include natural re-vegetation for nature conservation and ecological interests. BP25 records that restoration may be sought where necessary. In practice, any future extraction proposal at Argoed Isha could be accompanied by a restoration-led scheme involving landform improvement, habitat creation, ecological enhancement and long-term stewardship. The site should therefore not be seen simply as a mineral reserve, but as a place where carefully managed extraction could unlock biodiversity, landscape and geodiversity benefits over time.

The site also represents the productive use of an underutilised brownfield quarry. The candidate site material identifies it as a brownfield / underutilised site. In land use terms, there is a clear logic in making effective use of an existing quarried landscape with established mineral status, rather than placing additional pressure on wholly undeveloped land elsewhere. In this case, the Council’s own evidence confirms the key factor: usable reserves remain and the site has the potential to be reworked.

There is finally a longer-term safeguarding benefit in recognising the case for continued extraction. PPW requires mineral resources to be safeguarded to prevent sterilisation by permanent development, and makes clear that landbanks should reflect “real possibilities for future mineral working”. Positive recognition of the benefits of continued extraction at Argoed Isha is therefore entirely consistent with the basic objectives of national minerals policy: prudent use of finite mineral resources, maintenance of flexibility in supply, and avoidance of circumstances in which sites with genuine future potential are prematurely written off.

12. Restoration, aftercare and biodiversity gain

The respondent’s case is not simply that Argoed Isha should be recognised as a future mineral source. It is also that any future reworking can and should be subject to a modern restoration-led scheme capable of securing environmental gains.

PPW contemplates restoration and aftercare proposals for inactive sites, including natural revegetation

for nature conservation and ecological interests. BP25 records that, where necessary, restoration may be sought at dormant sites. The candidate site material also identifies that the site is not close to internationally or nationally important wildlife sites, while noting the presence of existing ecological and geological interests that could be appropriately managed through buffers, mitigation and future planning controls. These are precisely the kinds of circumstances in which a carefully designed extraction and restoration scheme could deliver meaningful biodiversity and geodiversity benefits alongside the prudent working of the remaining mineral resource.
Future working at Argoed Isha should therefore not be viewed in binary opposition to environmental enhancement. The modern policy framework envisages integrated mineral development in which extraction, restoration and aftercare are part of a single coherent process. That is an additional reason why the Plan should positively recognise the site's continuing potential rather than leaving it in a policy grey area.
13. Overall conclusion
The evidence base points clearly to a more positive and more coherent treatment of Argoed Isha than is presently provided in the Deposit RLDP.
PPW says that landbanks should reflect "real possibilities for future mineral working" and that prohibition orders are appropriate where there is "no prospect of future working". MTAN1 requires a separate assessment of "dormant reserves" and seeks "A more realistic landbank assessment". SWRAWP states that "Caution must be exercised in using these landbank figures". BP25 records that "useable reserves remain at the site and could be extracted if required" and that they "have the potential to be reworked". The Development Plans Manual requires plans to be based on robust evidence and to be deliverable.
Against that background, the Council's reliance on the proposition that the RTS2 indicates no further allocations are specifically required does not dispose of the issue. It may explain why there is no immediate need for a fresh mineral allocation, but it does not justify a passive or dismissive treatment of Argoed Isha. The more sound and evidence-based approach is to recognise that, whilst no additional formal allocation is presently required, Argoed Isha remains a dormant limestone quarry with usable reserves and realistic future reactivation potential, capable of coming forward in future under modern policies for sustainable working, restoration and aftercare.
14. Summary
These representations contend that, whilst the Deposit RLDP minerals strategy is broadly supported, the Plan is unsound in part in its treatment of Argoed Isha Quarry. In particular, the objection goes principally to whether the Plan is justified by the evidence and whether it is effective in delivery. The objection also concerns consistency with national minerals policy to the extent that the Deposit RLDP does not fully reflect PPW and MTAN1 in positively planning for the safeguarding and potential future working of this identified limestone resource.
 Strategic Policy SP18 – Minerals Supply and Safeguarding: Support in part / Object in part.
The respondent supports the overarching strategy of maintaining a continuous supply of minerals, safeguarding mineral resources and avoiding sterilisation. However, objection is taken insofar as the strategy does not carry through the Council's own evidence that Argoed Isha retains usable reserves and future potential for reworking.
 Policy MIN1 – Mineral Safeguarding Areas: Support.
This policy is supported because it reflects national policy by safeguarding limestone resources from permanent development that would sterilise them or hinder future extraction.
That approach is directly relevant to Argoed Isha, which remains a safeguarded resource with extant mineral significance.
 Policy MIN2 – Quarry Buffer Zones: Support.
The principle of protecting mineral operations from encroachment by incompatible development is supported. If Argoed Isha is to remain a realistic future source of limestone, the Plan should continue to avoid prejudice to its potential reactivation.
 Policy MIN3 – Dormant Mineral Sites: Support in principle / Object in part.
The respondent supports the Council's decision not to serve a Prohibition Order at Argoed Isha. That is plainly the correct approach because BP25 confirms that usable reserves remain and may be reworked. However, objection is taken to the absence of stronger wording recognising that the site remains a realistic future source of limestone.
 Policy MIN4 – Sustainable Mineral Working: Support in principle.
The respondent supports the policy framework for future reworking or reopening of old workings, including the need for acceptable impacts, restoration and beneficial after-use. Argoed Isha is capable of being assessed under that type of modern policy framework.
 Supporting text to the dormant quarry provisions / paragraph 6.386 equivalent approach: Object in part.
The Plan is correct to recognise that the reserves at Argoed Isha could be reworked in future. The objection is that this conclusion is not carried through into a fuller and more positive policy narrative.
 Plan Period: Object.
Amend in line with the Development Plans Manual such that there are at least 10 years remaining at adoption.
 Candidate Site 411 – Argoed Isha Quarry: Object.

The respondent objects to the candidate site assessment insofar as the site appears to have been rejected solely or mainly because RTS2 indicates that no further allocations are specifically required. That is too narrow an approach and does not properly reflect PPW, MTAN1, SWRAWP or BP25's conclusion that usable reserves remain and may be reworked.
 Minerals Background Paper BP25: Support in part / Object in part.
BP25 is supported where it correctly records that Argoed Isha is dormant, that usable reserves remain, and that the site has the potential to be reworked. Objection is taken only insofar as the Deposit RLDP does not fully reflect the implications of that evidence in a more positive and coherent plan-led position.
 Temporary training use: Clarificatory comment in support of the representation.
The current training use does not sterilise the limestone reserve. BP25 records the temporary training use until 2030 while also confirming that usable reserves remain and that the site may be reworked. It should therefore be treated as an interim use only.
 Benefits of continued extraction at Argoed Isha: Positive material consideration.
Continued extraction at Argoed Isha would make productive use of an existing dormant quarry with remaining usable reserves, support local and sub-regional limestone supply from a Vale source, contribute to flexibility and resilience in the minerals strategy, and enable future working to proceed under modern planning controls with restoration, aftercare and biodiversity enhancement.
 Overall position on the Deposit RLDP minerals strategy: Support in part / Object in part.
In overall terms, the respondent supports the Deposit RLDP's general minerals framework.
The objection is a precise and limited one: the Plan should more clearly and positively recognise Argoed Isha as a dormant quarry with usable reserves, realistic reactivation
potential, and scope for a future scheme of continued extraction and restoration, such that the Plan is properly justified by its evidence base and effective in delivering a resilient minerals strategy over the plan period.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3j3
Email Representation - https://valeofglamorgan.oc2.uk/a/3j4

7130 Object

Document Element: MIN3 - DORMANT MINERAL SITES
Respondent: Tom Prichard (Holdings) Ltd [3738]
Agent: Highlight Planning

Summary:

Objection is taken to the absence of stronger wording recognising that the site remains a realistic future source of limestone.

Full text:

REPRESENTATIONS TO THE DEPOSIT VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036 ON BEHALF OF TOM PRICHARD (HOLDINGS) LTD
1. Introduction
These representations are submitted on behalf of Tom Prichard (Holdings) Ltd in respect of the Deposit Vale of Glamorgan Replacement Local Development Plan 2021–2036. They relate specifically to the Plan's minerals strategy and policy framework, the treatment of dormant mineral sites, and the candidate site assessment and supporting evidence relating to Argoed Isha Quarry, Llansannor.
The respondent supports the broad direction of the Deposit RLDP minerals framework, but contends that the Plan is unsound in part in the way it presently treats Argoed Isha Quarry. The central point is straightforward: the Council's own evidence accepts that usable reserves remain at the site, that those reserves could still be extracted if required, and that the site has the potential to be reworked. Yet that conclusion is not carried through into a sufficiently positive and coherent plan-led position.
The objection is therefore not to the principle of maintaining a minerals strategy founded on safeguarding, environmental protection and modern control of extraction. Nor is it suggested that the Plan must necessarily allocate Argoed Isha as a new specific site simply because a candidate site was submitted. Rather, the objection is that the Deposit RLDP does not properly reflect the evidential position it has itself reached. It acknowledges that Argoed Isha should not be made subject to a Prohibition Order, but stops short of recognising clearly that the site remains a dormant limestone quarry with continuing mineral significance, realistic future reactivation potential and scope for future working under modern planning controls, restoration obligations and biodiversity enhancement.
2. Site context and planning status
Argoed Isha is a long-established limestone quarry. The candidate site planning statement explains that the site has a historic quarry planning status, that recommencement would require updated working conditions, and that the site was promoted through the candidate site process precisely

because there remains interest in recommencing mineral extraction. The same statement records the local planning authority's earlier position that, in relation to a previous proposal, the Council could only seek a Prohibition Order if it was satisfied that resumption of extraction was unlikely, but that "this requirement is not met" at Argoed Isha because of continuing interest in re-opening the quarry. It also records the mineral adviser's view that "The site currently has planning permission for a quarry" and that, absent relinquishment, "the permission to quarry remains valid".

The candidate site material also addresses availability and deliverability. It states that the site is available for development, that the proposal is considered viable and deliverable owing to the underlying need for the mineral, and that the site is a brownfield / underutilised site. It further notes that the proposal comprises mineral development within a mineral safeguarding area and within a site which benefits from a planning permission for quarrying, such that it is considered acceptable in principle. Those points are important because they show that Argoed Isha is not simply a theoretical reserve detached from any realistic prospect of future use.

3. Soundness and the role of evidence

The Development Plans Manual states that plans should be based on robust evidence so they can be delivered and that LPAs must be able to demonstrate, in broad terms, that the plan is deliverable with no significant impediments to implementation. It also emphasises the importance of a detailed candidate site process and of ensuring delivery and viability are embedded in that process from the outset. Elsewhere, the Manual explains that the plan-making process should prepare more effective, efficient and deliverable plans and refers expressly to the tests of soundness which must be satisfied if a development plan is to be recommended for adoption.

Those principles matter here because the Council had before it a candidate site submission which set out the site's planning status, constraints, deliverability and rationale for retention as a mineral site. It also had its own local evidence in BP25 and the wider regional evidence from RTS2, the sub-regional collaboration work and SWRAWP. In those circumstances, a sound plan ought to explain clearly how that evidence has informed the Council's chosen strategy for Argoed Isha. In the respondent's submission, the Deposit RLDP presently falls short because it recognises part of the evidence, but not its full implications. The Plan is therefore unsound in part because it is not fully justified by the evidence and is not as effective as it should be in setting out a coherent future approach to this dormant but still viable mineral resource.

4. National policy context – Planning Policy Wales

Planning Policy Wales establishes the national context for these representations. It requires planning authorities to maintain landbanks for non-energy minerals in demand and states that, for crushed rock, a minimum ten-year landbank should be maintained through the plan period unless agreement is reached for other authorities to make a compensating increase in provision. PPW also recognises that individual authority boundaries are not always an adequate basis for landbank policy where environmental constraints are too important or workable resources too limited, in which case authorities must agree a joint approach with neighbouring authorities in line with regional arrangements.

PPW is especially important in relation to inactive sites. Paragraph 5.14.17 provides that inactive sites with planning permission for future working which are considered unlikely to be reactivated should be identified in the development plan and should be the subject of a suitable strategy, which could include prohibition orders, restoration and aftercare proposals, and a suitable proposed after-use. Paragraph 5.14.18 then states that "It is in the interests of the minerals industry that landbanks reflect real possibilities for future mineral working" and adds that, where sites have been inactive and "there is no prospect of future working", authorities should consider the use of prohibition orders.

That distinction is central to the present case. The Council has not concluded that there is no prospect of future working at Argoed Isha. Quite the contrary: BP25 states that usable reserves remain at the site, that they could be extracted if required, and that they have the potential to be reworked. The logic of PPW is therefore that Argoed Isha is not a site to be treated as effectively closed or exhausted. It remains a site with continuing mineral relevance, albeit one that would require modern conditions and a fresh scheme of workings before any extraction could recommence.

PPW is also directly relevant to areas of future working. Paragraph 5.14.19 states that "Where necessary, planning authorities should provide a clear guide to where non-energy mineral extraction is likely to be acceptable" and that policies and proposals should cover mineral resources "which are currently used or which may need to be used in the foreseeable future". It further explains that such areas should be clearly identified on a proposals map and may take the form, in order of preference, of specific sites, preferred areas or areas of search.

The respondent does not suggest that PPW compels the Council to identify Argoed Isha as a specific site. However, PPW plainly supports a more positive and more explicit plan-led recognition of sites which retain real future mineral potential. Once the Council's own evidence accepts that Argoed Isha is such a site, it is difficult to reconcile a largely passive policy response with the national expectation that development plans should give a clear guide to where future mineral working may be acceptable.

5. National policy context – MTAN1

MTAN1 reinforces the need for a realistic and evidence-based approach to landbanks and dormant sites. It explains that a landbank is composed of permitted reserves at active and inactive sites, and that development plans should include an assessment of both the current and future landbank. Paragraph 47 then states that development plans should identify those sites that are dormant and

count these as “dormant reserves” to be clearly shown in landbank calculations as a separate category. Paragraph 48 continues by stating that a more realistic approach is required, observing that extensive historic landbanks can perpetuate unsustainable supply patterns if left unaltered. MTAN1 therefore states that “A more realistic landbank assessment is the aim of this process” so that a more accurate picture is obtained of permitted reserves “that are likely to have real potential for future working”.

That policy language is highly material. It confirms that dormant reserves are not irrelevant simply because they are not counted within the active landbank. They are to be identified separately and realistically assessed. That is precisely the position that should be taken with Argoed Isha. The Council has already undertaken the essential assessment in substance through BP25 and has concluded that usable reserves remain and that the site has the potential to be reworked. MTAN1 therefore supports a more nuanced and more positive treatment of the site than a simple “no allocation required” conclusion.

MTAN1 also recognises that in some authorities it may not be possible or acceptable to provide an adequate current or extended landbank because of environmental designations, limited suitable resources, or amenity considerations, and that RAWPs should consider the environmental capacity of authorities to supply aggregates. This is an important reminder that reserve arithmetic is not the only issue. Deliverability, environmental capacity, and the practical availability of reserves remain relevant.

6. Apportionment and Plan Period

The regional and sub-regional evidence does not undermine the respondent’s case. It explains why there is no present quantitative requirement for a further minerals allocation in the Vale, but it does not justify a negative or dismissive treatment of Argoed Isha.

BP25 records the RTS2 and Statement of Sub-Regional Collaboration position for the Cardiff City subregion. Table 5 identifies the Vale of Glamorgan apportionment for crushed rock as 17.05 million tonnes over 25 years, with existing permitted reserves of 18.73 million tonnes at the end of 2016 and a minimum allocation needed of 0, alongside 13 million tonnes of additional reserves at dormant sites. BP25 then states that, based on those figures, the SSRC identifies that the Vale of Glamorgan does not require any allocations for future workings of crushed rock to be identified within the RLDP.

Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.

On the Council’s current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.

Based on the current timetable, an end date of 2038 (with associated review of mineral reserves) would therefore ensure a sound plan.

Notwithstanding our comment in respect of the Plan Period, we remain concerned of how the Plan should treat a dormant site which the Council accepts has remaining usable reserves and realistic reactivation potential. Nor does it justify treating Argoed Isha as though it lacked future significance. The respondent’s case is therefore not that the RTS2 figure is wrong, but that it has been taken too far. A conclusion that no additional formal allocation is presently required is not the same thing as a conclusion that the site has no future role.

7. BP25 – the Council’s own minerals evidence

BP25 is the most important local evidence document for present purposes. It records that the Vale of Glamorgan is an “important supplier of Carboniferous limestone for general aggregate use”. It then addresses dormant mineral sites in the Vale. Paragraphs 5.48 to 5.50 explain that many dormant sites have not been worked for many years and are considered unlikely to be worked in the future; accordingly, the Council intends to serve Prohibition Orders on those sites, which would provide certainty for nearby residents and remove reserves which are not realistically available. BP25 also explains that the level of reserves at dormant sites is not counted in the landbank.

Crucially, BP25 then distinguishes Argoed Isha from that general class of dormant sites. Paragraph 5.51 states: “While Argoed Isha quarry is classified as ‘dormant’, useable reserves remain at the site and could be extracted if required.” It goes on to record that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030, but then adds: “While the reserves at the site are not included in the current landbank, they have the potential to be reworked and therefore a Prohibition Order will not be served at Argoed Isha Quarry until the current circumstances change.”

That is a very clear evidential conclusion. BP25 does not simply refrain from prohibiting the site without explanation. It positively explains why Argoed Isha is different: usable reserves remain, they could be extracted if required, and they have the potential to be reworked. In the respondent’s submission, that conclusion requires a correspondingly clearer and more positive policy response within the Deposit RLDP than is presently provided.

BP25 is also supportive on restoration and aftercare. It states that the serving of Prohibition Orders is intended to provide certainty and, where necessary, restoration of sites may be sought. More broadly, the background paper recognises the importance of sustainable minerals management and

balancing mineral extraction with environmental protection and community well-being. That policy background is entirely consistent with the respondent's case that any future working at Argoed Isha should be controlled through a modern framework of environmental safeguards and restoration-led after-use.

8. SWRAWP Annual Report 2024

The SWRAWP Annual Report 2024 is also highly relevant because it warns against over-reliance on headline landbank figures. Paragraph 4.10 states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects that may restrict the availability of certain reserves, nor constraints arising from changes in planning policy, protected site designation or other non-planning permitting requirements. Paragraph 4.11 then confirms that dormant sites have not been included in landbank calculations and that local planning authorities should carry out their own assessments of the likelihood of reactivation, but that in any event "dormant reserves must be counted separately".

That evidence materially supports the respondent's case. It shows that the statement "no further allocations are specifically required" is not, in itself, the end of the analysis. Landbank figures are a starting point, but they do not tell the whole story. Questions of practical availability, regulatory and environmental constraints elsewhere, and the separate role of dormant reserves remain relevant. Argoed Isha therefore retains importance as part of the broader mineral resource picture even though it is not part of the active landbank.

9. Response to the Council's candidate site assessment

The Council's candidate site assessment records that a positive allocation for mineral working is not included because "the 2nd Review of the Minerals Regional Technical Statement indicates no further allocations are specifically required to be identified within the Vale of Glamorgan RLDP". That point should be addressed directly.

The respondent accepts that the RTS2 position explains why the Council may have concluded that there is no immediate need for a fresh mineral allocation in quantitative terms. However, that is not a sufficient reason, on its own, to reject a more positive policy treatment of Argoed Isha or to give the impression that the site lacks future significance. BP25 itself shows why. It records both that the Vale does not presently require additional allocations and, separately, that Argoed Isha retains remaining usable reserves and has the potential to be reworked. Those two propositions are not inconsistent. They point toward a more nuanced and more accurate conclusion: namely, that Argoed Isha may not need to be allocated now to meet a current numerical shortfall, but it remains a dormant limestone reserve of continuing strategic relevance that should be positively recognised within the Plan.

That approach is also supported by PPW, MTAN1 and SWRAWP. PPW states that landbanks should reflect "real possibilities for future mineral working" and that prohibition orders are appropriate where there is "no prospect of future working". MTAN1 requires dormant reserves to be separately identified and assessed so as to achieve "A more realistic landbank assessment". SWRAWP says that "Caution must be exercised" in using landbank figures and that dormant reserves must be counted separately. Those documents all point to a need for a broader planning judgment than simple reserve arithmetic.

Accordingly, the flaw in the candidate site reasoning is not that it refers to the RTS2 position, but that it appears to stop there. In the respondent's submission, the sounder and more evidence-based approach would have been either to give the site more positive recognition in the Plan's supporting text, or at the very least to make clear that the site was not allocated because no immediate additional allocation was required, not because the site lacked merit, availability or future potential.

Moreover, SWRAWP reinforces the point that reserve arithmetic is not the whole picture. It states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects, changes in planning policy, protected site designations or other permitting constraints. This is particularly relevant given the increasingly important role of NRW licensing and abstraction controls, including quarry dewatering considerations, which may mean that some reserves are no longer as readily available or economically viable as historic landbank figures imply. Accordingly, apparent reserve sufficiency in quantitative terms may overstate the extent of genuinely deliverable supply.

10. The existing temporary training permission does not sterilise the reserve

BP25 states that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030. The significance of that point is not that the site has permanently moved away from minerals. The significance is the opposite: BP25 records the temporary training use while simultaneously concluding that usable reserves remain and may be reworked, and that a Prohibition Order should therefore not be served.

In planning terms, a temporary training use of this kind cannot properly be treated as sterilising the mineral reserve. PPW's safeguarding policy is concerned with preventing sterilisation by permanent development. A time-limited interim use, particularly one expressly acknowledged in BP25 as coexisting with a potentially reworkable reserve, does not extinguish the underlying mineral significance of the site. The temporary training use should therefore be understood as an interim overlay rather than a permanent change in land use character.

11. Benefits of continued extraction at Argoed Isha Quarry

Continued extraction at Argoed Isha Quarry would give rise to a number of site-specific and strategic benefits which the Deposit RLDP should recognise when considering the future role of the site.

The site is not a greenfield mineral proposal on an entirely undeveloped site. It is an existing quarry

with a long-established mineral planning history and extant mineral status in principle, subject to updated modern conditions. The principle of mineral working at the site is therefore already established in land use terms, and the future reworking of the reserve would represent the continuation of an existing mineral use rather than the introduction of quarrying into a wholly new location. That is a material distinction when considering the appropriateness of retaining the site as a realistic future mineral resource.

Continued extraction would also assist in making use of a proven local limestone resource in the Vale of Glamorgan, rather than forcing greater reliance on more distant or more constrained sources. BP25 confirms that the Vale is an “important supplier of Carboniferous limestone for general aggregate use”. In practical terms, continued extraction at Argoed Isha would accord with the proximity principle by helping to meet demand from a comparatively well-located source close to markets in the Vale and wider Cardiff area, rather than depending unduly on more remote sources or on supply patterns that may become more constrained over time.

The site would also contribute to the resilience and flexibility of the wider minerals supply position. Even if no immediate additional allocation is numerically required under RTS2, national and regional policy make clear that landbank figures are not the only relevant consideration. A dormant quarry with remaining usable reserves provides contingency, flexibility and productive capacity in the event that supply circumstances change during the plan period. This is especially important where SWRAWP warns that landbank figures do not capture geographical, operational, policy or other permitting constraints, and where MTAN1 requires a realistic view of reserves with future potential. Argoed Isha therefore has value not merely as a theoretical reserve, but as part of a resilient longer-term supply position.

Continued extraction at Argoed Isha would also support local supply chains and a more diverse quarrying sector. The candidate site submission identified the benefit of maintaining provision from a range of operators, including smaller and medium-sized businesses, rather than relying only on a limited number of larger established sites. In planning terms, that diversity is relevant to continuity of supply, competition, responsiveness to local demand and the overall resilience of the minerals sector in the Vale and wider region.

A further benefit is that any future extraction would be carried out under modern planning control rather than being left sterilised or underused. If the site is reworked in future, that would necessarily be through a fresh scheme of modern conditions and under the policy framework of the RLDP and national minerals policy. Issues such as traffic, hydrology, hydrogeology, ecology, landscape, amenity, blasting, dust, restoration and long-term aftercare would all be capable of being addressed through a contemporary planning and environmental control regime. That is an important benefit in itself, because it means any future extraction would not take place under outdated historic controls, but under a modern framework designed to secure sustainable mineral working.

Continued extraction would also create the opportunity for a comprehensive restoration and aftercare strategy delivering environmental gains. PPW recognises that restoration and aftercare proposals for inactive sites may include natural re-vegetation for nature conservation and ecological interests. BP25 records that restoration may be sought where necessary. In practice, any future extraction proposal at Argoed Isha could be accompanied by a restoration-led scheme involving landform improvement, habitat creation, ecological enhancement and long-term stewardship. The site should therefore not be seen simply as a mineral reserve, but as a place where carefully managed extraction could unlock biodiversity, landscape and geodiversity benefits over time.

The site also represents the productive use of an underutilised brownfield quarry. The candidate site material identifies it as a brownfield / underutilised site. In land use terms, there is a clear logic in making effective use of an existing quarried landscape with established mineral status, rather than placing additional pressure on wholly undeveloped land elsewhere. In this case, the Council’s own evidence confirms the key factor: usable reserves remain and the site has the potential to be reworked.

There is finally a longer-term safeguarding benefit in recognising the case for continued extraction. PPW requires mineral resources to be safeguarded to prevent sterilisation by permanent development, and makes clear that landbanks should reflect “real possibilities for future mineral working”. Positive recognition of the benefits of continued extraction at Argoed Isha is therefore entirely consistent with the basic objectives of national minerals policy: prudent use of finite mineral resources, maintenance of flexibility in supply, and avoidance of circumstances in which sites with genuine future potential are prematurely written off.

12. Restoration, aftercare and biodiversity gain

The respondent’s case is not simply that Argoed Isha should be recognised as a future mineral source. It is also that any future reworking can and should be subject to a modern restoration-led scheme capable of securing environmental gains.

PPW contemplates restoration and aftercare proposals for inactive sites, including natural revegetation for nature conservation and ecological interests. BP25 records that, where necessary, restoration may be sought at dormant sites. The candidate site material also identifies that the site is not close to internationally or nationally important wildlife sites, while noting the presence of existing ecological and geological interests that could be appropriately managed through buffers, mitigation and future planning controls. These are precisely the kinds of circumstances in which a carefully designed extraction and restoration scheme could deliver meaningful biodiversity and geodiversity

benefits alongside the prudent working of the remaining mineral resource.
Future working at Argoed Isha should therefore not be viewed in binary opposition to environmental enhancement. The modern policy framework envisages integrated mineral development in which extraction, restoration and aftercare are part of a single coherent process. That is an additional reason why the Plan should positively recognise the site's continuing potential rather than leaving it in a policy grey area.
13. Overall conclusion
The evidence base points clearly to a more positive and more coherent treatment of Argoed Isha than is presently provided in the Deposit RLDP.
PPW says that landbanks should reflect "real possibilities for future mineral working" and that prohibition orders are appropriate where there is "no prospect of future working". MTAN1 requires a separate assessment of "dormant reserves" and seeks "A more realistic landbank assessment". SWRAWP states that "Caution must be exercised in using these landbank figures". BP25 records that "useable reserves remain at the site and could be extracted if required" and that they "have the potential to be reworked". The Development Plans Manual requires plans to be based on robust evidence and to be deliverable.
Against that background, the Council's reliance on the proposition that the RTS2 indicates no further allocations are specifically required does not dispose of the issue. It may explain why there is no immediate need for a fresh mineral allocation, but it does not justify a passive or dismissive treatment of Argoed Isha. The more sound and evidence-based approach is to recognise that, whilst no additional formal allocation is presently required, Argoed Isha remains a dormant limestone quarry with usable reserves and realistic future reactivation potential, capable of coming forward in future under modern policies for sustainable working, restoration and aftercare.
14. Summary
These representations contend that, whilst the Deposit RLDP minerals strategy is broadly supported, the Plan is unsound in part in its treatment of Argoed Isha Quarry. In particular, the objection goes principally to whether the Plan is justified by the evidence and whether it is effective in delivery. The objection also concerns consistency with national minerals policy to the extent that the Deposit RLDP does not fully reflect PPW and MTAN1 in positively planning for the safeguarding and potential future working of this identified limestone resource.
 Strategic Policy SP18 – Minerals Supply and Safeguarding: Support in part / Object in part.
The respondent supports the overarching strategy of maintaining a continuous supply of minerals, safeguarding mineral resources and avoiding sterilisation. However, objection is taken insofar as the strategy does not carry through the Council's own evidence that Argoed Isha retains usable reserves and future potential for reworking.
 Policy MIN1 – Mineral Safeguarding Areas: Support.
This policy is supported because it reflects national policy by safeguarding limestone resources from permanent development that would sterilise them or hinder future extraction.
That approach is directly relevant to Argoed Isha, which remains a safeguarded resource with extant mineral significance.
 Policy MIN2 – Quarry Buffer Zones: Support.
The principle of protecting mineral operations from encroachment by incompatible development is supported. If Argoed Isha is to remain a realistic future source of limestone, the Plan should continue to avoid prejudice to its potential reactivation.
 Policy MIN3 – Dormant Mineral Sites: Support in principle / Object in part.
The respondent supports the Council's decision not to serve a Prohibition Order at Argoed Isha. That is plainly the correct approach because BP25 confirms that usable reserves remain and may be reworked. However, objection is taken to the absence of stronger wording recognising that the site remains a realistic future source of limestone.
 Policy MIN4 – Sustainable Mineral Working: Support in principle.
The respondent supports the policy framework for future reworking or reopening of old workings, including the need for acceptable impacts, restoration and beneficial after-use. Argoed Isha is capable of being assessed under that type of modern policy framework.
 Supporting text to the dormant quarry provisions / paragraph 6.386 equivalent approach: Object in part.
The Plan is correct to recognise that the reserves at Argoed Isha could be reworked in future. The objection is that this conclusion is not carried through into a fuller and more positive policy narrative.
 Plan Period: Object.
Amend in line with the Development Plans Manual such that there are at least 10 years remaining at adoption.
 Candidate Site 411 – Argoed Isha Quarry: Object.
The respondent objects to the candidate site assessment insofar as the site appears to have been rejected solely or mainly because RTS2 indicates that no further allocations are specifically required. That is too narrow an approach and does not properly reflect PPW, MTAN1, SWRAWP or BP25's conclusion that usable reserves remain and may be reworked.
 Minerals Background Paper BP25: Support in part / Object in part.
BP25 is supported where it correctly records that Argoed Isha is dormant, that usable

reserves remain, and that the site has the potential to be reworked. Objection is taken only insofar as the Deposit RLDP does not fully reflect the implications of that evidence in a more positive and coherent plan-led position.
 Temporary training use: Clarificatory comment in support of the representation.
The current training use does not sterilise the limestone reserve. BP25 records the temporary training use until 2030 while also confirming that usable reserves remain and that the site may be reworked. It should therefore be treated as an interim use only.
 Benefits of continued extraction at Argoed Isha: Positive material consideration.
Continued extraction at Argoed Isha would make productive use of an existing dormant quarry with remaining usable reserves, support local and sub-regional limestone supply from a Vale source, contribute to flexibility and resilience in the minerals strategy, and enable future working to proceed under modern planning controls with restoration, aftercare and biodiversity enhancement.
 Overall position on the Deposit RLDP minerals strategy: Support in part / Object in part.
In overall terms, the respondent supports the Deposit RLDP's general minerals framework.
The objection is a precise and limited one: the Plan should more clearly and positively recognise Argoed Isha as a dormant quarry with usable reserves, realistic reactivation
potential, and scope for a future scheme of continued extraction and restoration, such that the Plan is properly justified by its evidence base and effective in delivering a resilient minerals strategy over the plan period.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3j3
Email Representation - https://valeofglamorgan.oc2.uk/a/3j4

6814 Object

Document Element: MIN4 – SUSTAINABLE MINERAL WORKING

Respondent: Mineral Products Association (Mr Peter Nicholas Horsley, Planning Director) [689]

Summary:

Object - This policy wording does not reflect PPW (5.11) which seeks to "promote" and not "prioritise" the use of recycled material and secondary aggregates.
Further the word "only" is superfluous and should be deleted.

Reword the policy:

"Proposals which PROMOTE (~prioritise~) the use of recycled material and secondary aggregates AS AN ALTERNATIVE TO (~before new sources of~) primary materials (~are developed~) will be SUPPORTED (~favoured~) where this does not have an unacceptable effect on amenity or the environment.

Proposals for the extraction of new primary minerals will (~only~) be permitted where there is a proven national, regional or local need for the mineral and where:"

Full text:

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and industrial sand industries. MPA is the sectoral voice for mineral products, covering 100% of UK cement and lime production, 90% of GB aggregates production, 95% of asphalt and over 60% of ready-mixed concrete and precast concrete production. In 2023, the industry supplied £18.4 billion worth of materials and services to the Economy, directly generating £6.7 billion in Gross Value Added (GVA). It is the largest supplier to the construction industry, which generated £141.5 billion in GVA in 2023. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting us on the above document. Mineral supply will be critical to delivering many of the objectives identified in the preferred strategy as well as many of the national infrastructure project proposed such as floating offshore wind in the Celtic Sea. We have major concerns over the reliance on outdated reserve information and the evidence base must reflect up to date reserve and sales statistics, together with projected demand for major developments.

It is disappointing that despite previous representations in 2022 & 2024, the points highlighted have not been addressed. We have therefore, reiterated our concerns below. We have also suggested alternative wording where appropriate.

We welcome further engagement on this matter to address the concerns.

2.50 Regional Technical Statement for Aggregates (2020) Second Review
We support the reference to the RTS (2nd Review), however, as the authority should be aware, WG has commission a further review (RTS3) which is expected to be published at the end of 2026/early 2027
Note the comment as this will be a material consideration as the plan progresses.

5.35 Barry Docks – ABP Masterplan.
Support - We note ABP's potential for rare earth processing at the Black Rocks Growth Zone and would support such a proposal.
No further comment

SP17 SUSTAINABLE WASTE MANAGEMENT
Support - We note the proposals to facilitate sustainable waste management facilities on …. operational or non-operational mineral working sites and would support this.
No further comment

SP18 Sustainable Provision of Minerals
The local and regional need for the provision of a continuous supply of minerals will be achieved through:
1 Maintaining a minimum of 10 years land bank of crushed rock throughout the plan period.
2 Favouring proposals which promote the sustainable use of minerals and encourage the use of secondary and alternative resources.
3 The safeguarding of known resources of sandstone, limestone, sand and gravel (where these occur outside settlements), from permanent development that would unnecessarily sterilise them or hinder their future extraction; and
4 Safeguarding railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate.
Object - Whilst we can support various elements in the proposed policy, we have concerns over the specific wording in it and the supporting text.
Most notably, subsection 2 does not accord with the PPW (5.11.4) in relation to the use of secondary and RECYCLED materials. It is not clear what is meant by "ALTERNATIVE RESOURCES". This should be replaced. Secondly, PPW "PROMOTES THE USE" and does not reference "favouring proposals. Accordingly, the wording should be amended to reflect PPW

Also, in relation to subsection 4, the proposed policy does not seek to apply safeguarding to minerals infrastructure as is required by PPW (5.14.7 & 5.24.8). Minerals infrastructure is more than just transportation hubs, it includes the wider processing facilities. Subsection 4 should therefore be amended.
The Policy should be amended to read -
"2 (~Favouring proposals which~) Promote the sustainable use of minerals and encourage the use of secondary and RECYCLED MATERIALS. (~alternative resources~)."
"4 Safeguarding EXISTING AND PLANNED INFRASTRUCTURE, INCLUDING railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, TOGETHER WITH WIDER MINERALS PROCESSING INFRASTRUCTURE.
6.373 This paragraph states "The 2nd Review of the Minerals Regional Technical Statement for the South Wales area, commonly referred to as RTS2, was published by the South Wales Regional Aggregates Working Party (SWRAWP) in September 2020. Appendix B of the RTS includes specific recommendations and guidance for each Local Planning Authority."
While this statement is factual, we suggest an additional sentence to reflect that Welsh Government has commission a further review of the Regional Technical Statement (RTS3) which has already commenced and is scheduled for completion by the end of 2026.
Add additional sentence to reflect RTS3.

6.374 This paragraph states
"In November 2021, the Welsh Government's Chief Planning Officer issued a Policy Clarification letter to rectify an arithmetical error within the RTS2. The clarification letter indicated that the apportionment for the Vale of Glamorgan is 17.05 million tonnes of crushed rock over 25 years. There is an existing landbank of 18.73 million tonnes of crushed rock (as of 31st December 2016), all of which relates to Carboniferous Limestone. There is no apportionment and no land bank for land-won sand and gravel."
We have significant concerns that the evidence base for the local plan has not been updated. Whilst RTS2 is undoubtedly material, the statement that "There is an existing landbank of 18.73 million tonnes of crushed rock" is not correct. As stated in the text, this is the landbank as of 31st December 2016. The Council must update its evidence base and provide a landbank figure which reflects the current permitted reserves.
Since the publication of the RTS2, there have been numerous publications to assist in updating the evidence base including the SWRAWP reports and AM2023.
In our responses to earlier iterations and consultations on the RLDP we highlighted the need for the Council to update the reserve figures. We also highlighted that planning submissions had indicated that circa 16.5mt of permitted reserve is suitable for non-aggregate use.
It is not clear if this tonnage is included in the 18.73mt referred too.
Greater clarity and analysis is required.

6.374 The wording also states "The report concludes that in view of the slight surplus of existing permitted crushed rock reserves and the lack of sand and gravel production in the Vale of Glamorgan, no further allocations are specifically required to be identified within the RLDP."
The "slight surplus" referred to was the position at 31st December 2016. The reserve figure needs to be updated.
Update the reserve figures to allow an accurate landbank tobe determined and the need for future allocations to be properly assessed. This should separate out projected aggregate and non-aggregate reserves to ensure clarity.

6.375 The wording states "The RTS2 requires Statements of Sub-regional Collaboration (SSRC) to be prepared by all constituent LPAs within each RTS sub-region. The Vale of Glamorgan along with Bridgend, Cardiff, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly and the Brecon Beacons National Park forms part of the Cardiff City subregion. The latest position statement for this sub-region (July 2022) indicates that while most authorities in the region, including the Vale of Glamorgan, can meet their apportionment for crushed rock, there is a shortfall of 7.475 million tonnes (Mt) within Cardiff that would require an additional RLDP allocation."
Whilst the position statement referred to may suggest that the apportionment can be adequately met, as highlighted above, there are major concerns that the evidence base being relied upon is out of date. Further, Annex A of the RTS requires that "The LPAs involved should demonstrate, as far as possible, that the SSRC has been produced in consultation with relevant stakeholders, including the Regional Aggregate Working Party (RAWP), as part of the LDP process." This has not been done and as such the SSRC process adopted is fundamentally flawed.
As clearly stated in our previous representations, there are major concerns over the evidence base and the process of relying upon an SSRC which has not followed the requisite protocol.

MIN1 Development in Minerals Safeguarding Areas
Whilst we support the principle of the policy, we suggest the addition of a further subsection addressing the scope for prior extraction. PPW (5.14.7) states "the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered."
Add a further subsection to address the principle of prior extraction.

MIN2 Quarry Buffer Zones
This policy states "Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or
(~2 The proposal is located within an existing built-up area which already encroaches into the buffer zone."~)

Object - Proposed subsection 2 is not an exception to the national buffer zone policy PPW (5.14.44) and should therefore be deleted.
Delete Subsection 2 “Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or”
2 The proposal is located within an existing built-up area which already encroaches into the buffer zone.”

MIN4 Sustainable Mineral Working.
This policy states
“Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will only be permitted where there is a proven national, regional or local need for the mineral and where:”
Object - This policy wording does not reflect PPW (5.11) which seeks to “promote” and not “prioritise” the use of recycled material and secondary aggregates.
Further the word “only” is superfluous and should be deleted.
Reword the policy
“Proposals which PROMOTE (~prioritise~) the use of recycled material and secondary aggregates AS AN ALTERNATIVE TO (~before new sources of~) primary materials (~are developed~) will be SUPPORTED (~favoured~) where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will (~only~) be permitted where there is a proven national, regional or local need for the mineral and where:”

6.388 The wording states “In view of the current landbank of reserves with planning permission at existing mineral working sites within the Vale of Glamorgan, there is no requirement for the Plan to allocate additional areas for limestone extraction.”
As stated above, the Evidence Base has not been updated to provide a true representation of the landbank. The permitted reserves being quoted date from 2016 and cannot provide a sound platform upon which mineral provision or requirements can be determined.
Update the evidence as required.

6.389 The wording states “Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured. The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore, the extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (MTAN1 Paragraph 34).” As stated above, the PPW seeks to promote the use of secondary and recycled aggregates. The council has not provided any evidence that secondary and recycled materials are not being maximised, or that primary materials are being used instead of secondary material. There is simply no evidence of “overprovision”. Further this is a misquote of MTAN1 Paragraph 34.
Amend the text accordingly.
Reword the text “Proposals which (~prioritise~) PROMOTE the use of recycled material and secondary aggregates (~before new sources of~) AS AN ALTERNATIVE TO primary materials (~are developed~) will be SUPPORTED (~favoured~). (~The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore~), The extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (~(MTAN1 Paragraph 34)~)

Change suggested by respondent:

Reword the policy:

“Proposals which PROMOTE (~prioritise~) the use of recycled material and secondary aggregates AS AN ALTERNATIVE TO (~before new sources of~) primary materials (~are developed~) will be SUPPORTED (~favoured~) where this does not have an unacceptable effect on amenity or the environment.

Proposals for the extraction of new primary minerals will (~only~) be permitted where there is a proven national, regional or local need for the mineral and where:”

Sound: Not specified

Attachments:

Redacted Email Representation - https://valeofglamorgan.oc2.uk/a/3hn

6815 Comment

Document Element: MIN4 – SUSTAINABLE MINERAL WORKING

Respondent: Mineral Products Association (Mr Peter Nicholas Horsley, Planning Director) [689]

Summary:

Paragraph 6.388:

As stated above, the Evidence Base has not been updated to provide a true representation of the landbank. The permitted reserves being quoted date from 2016 and cannot provide a sound platform upon which mineral provision or requirements can be determined.

Update the evidence as required.

Full text:

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and industrial sand industries. MPA is the sectoral voice for mineral products, covering 100% of UK cement and lime production, 90% of GB aggregates production, 95% of asphalt and over 60% of ready-mixed concrete and precast concrete production. In 2023, the industry supplied £18.4 billion worth of materials and services to the Economy, directly generating £6.7 billion in Gross Value Added (GVA). It is the largest supplier to the construction industry, which generated £141.5 billion in GVA in 2023. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting us on the above document. Mineral supply will be critical to delivering many of the objectives identified in the preferred strategy as well as many of the national infrastructure project proposed such as floating offshore wind in the Celtic Sea. We have major concerns over the reliance on outdated reserve information and the evidence base must reflect up to date reserve and sales statistics, together with projected demand for major developments.

It is disappointing that despite previous representations in 2022 & 2024, the points highlighted have not been addressed. We have therefore, reiterated our concerns below. We have also suggested alternative wording where appropriate.

We welcome further engagement on this matter to address the concerns.

2.50 Regional Technical Statement for Aggregates (2020) Second Review
We support the reference to the RTS (2nd Review), however, as the authority should be aware, WG has commission a further review (RTS3) which is expected to be published at the end of 2026/early 2027
Note the comment as this will be a material consideration as the plan progresses.

5.35 Barry Docks – ABP Masterplan.
Support - We note ABP's potential for rare earth processing at the Black Rocks Growth Zone and would support such a proposal.
No further comment

SP17 SUSTAINABLE WASTE MANAGEMENT
Support - We note the proposals to facilitate sustainable waste management facilities on …. operational or non-operational mineral working sites and would support this.
No further comment

SP18 Sustainable Provision of Minerals
The local and regional need for the provision of a continuous supply of minerals will be achieved through:
1 Maintaining a minimum of 10 years land bank of crushed rock throughout the plan period.
2 Favouring proposals which promote the sustainable use of minerals and encourage the use of secondary and alternative resources.
3 The safeguarding of known resources of sandstone, limestone, sand and gravel (where these occur outside settlements), from permanent development that would unnecessarily sterilise them or hinder their future extraction; and
4 Safeguarding railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate.
Object - Whilst we can support various elements in the proposed policy, we have concerns over the specific wording in it and the supporting text.
Most notably, subsection 2 does not accord with the PPW (5.11.4) in relation to the use of secondary and RECYCLED materials. It is not clear what is meant by "ALTERNATIVE RESOURCES". This should be replaced. Secondly, PPW "PROMOTES THE USE" and does not reference "favouring proposals. Accordingly, the wording should be amended to reflect PPW
Also, in relation to subsection 4, the proposed policy does not seek to apply safeguarding to minerals infrastructure as is required by PPW (5.14.7 & 5.24.8). Minerals infrastructure is more than just transportation hubs, it includes the wider processing facilities. Subsection 4 should therefore be amended.
The Policy should be amended to read -
"2 (~Favouring proposals which~) Promote the sustainable use of minerals and encourage the use of secondary and

RECYCLED MATERIALS. (~alternative resources~).”
“4 Safeguarding EXISTING AND PLANNED INFRASTRUCTURE, INCLUDING railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, TOGETHER WITH WIDER MINERALS PROCESSING INFRASTRUCTURE.
6.373 This paragraph states “The 2nd Review of the Minerals Regional Technical Statement for the South Wales area, commonly referred to as RTS2, was published by the South Wales Regional Aggregates Working Party (SWRAWP) in September 2020. Appendix B of the RTS includes specific recommendations and guidance for each Local Planning Authority.”
While this statement is factual, we suggest an additional sentence to reflect that Welsh Government has commission a further review of the Regional Technical Statement (RTS3) which has already commenced and is scheduled for completion by the end of 2026.
Add additional sentence to reflect RTS3.

6.374 This paragraph states
“In November 2021, the Welsh Government’s Chief Planning Officer issued a Policy Clarification letter to rectify an arithmetical error within the RTS2. The clarification letter indicated that the apportionment for the Vale of Glamorgan is 17.05 million tonnes of crushed rock over 25 years. There is an existing landbank of 18.73 million tonnes of crushed rock (as of 31st December 2016), all of which relates to Carboniferous Limestone. There is no apportionment and no land bank for land-won sand and gravel.”
We have significant concerns that the evidence base for the local plan has not been updated. Whilst RTS2 is undoubtedly material, the statement that “There is an existing landbank of 18.73 million tonnes of crushed rock” is not correct. As stated in the text, this is the landbank as of 31st December 2016. The Council must update its evidence base and provide a landbank figure which reflects the current permitted reserves.
Since the publication of the RTS2, there have been numerous publications to assist in updating the evidence base including the SWRAWP reports and AM2023.
In our responses to earlier iterations and consultations on the RLDP we highlighted the need for the Council to update the reserve figures. We also highlighted that planning submissions had indicated that circa 16.5mt of permitted reserve is suitable for non-aggregate use.
It is not clear if this tonnage is included in the 18.73mt referred too.
Greater clarity and analysis is required.

6.374 The wording also states “The report concludes that in view of the slight surplus of existing permitted crushed rock reserves and the lack of sand and gravel production in the Vale of Glamorgan, no further allocations are specifically required to be identified within the RLDP.”
The “slight surplus” referred to was the position at 31st December 2016. The reserve figure needs to be updated.
Update the reserve figures to allow an accurate landbank tobe determined and the need for future allocations to be properly assessed. This should separate out projected aggregate and non-aggregate reserves to ensure clarity.

6.375 The wording states “The RTS2 requires Statements of Sub-regional Collaboration (SSRC) to be prepared by all constituent LPAs within each RTS sub-region. The Vale of Glamorgan along with Bridgend, Cardiff, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly and the Brecon Beacons National Park forms part of the Cardiff City subregion. The latest position statement for this sub-region (July 2022) indicates that while most authorities in the region, including the Vale of Glamorgan, can meet their apportionment for crushed rock, there is a shortfall of 7.475 million tonnes (Mt) within Cardiff that would require an additional RLDP allocation.”
Whilst the position statement referred to may suggest that the apportionment can be adequately met, as highlighted above, there are major concerns that the evidence base being relied upon is out of date. Further, Annex A of the RTS requires that “The LPAs involved should demonstrate, as far as possible, that the SSRC has been produced in consultation with relevant stakeholders, including the Regional Aggregate Working Party (RAWP), as part of the LDP process.” This has not been done and as such the SSRC process adopted is fundamentally flawed.
As clearly stated in our previous representations, there are major concerns over the evidence base and the process of relying upon an SSRC which has not followed the requisite protocol.

MIN1 Development in Minerals Safeguarding Areas
Whilst we support the principle of the policy, we suggest the addition of a further subsection addressing the scope for prior extraction. PPW (5.14.7) states “the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered.”
Add a further subsection to address the principle of prior extraction.

MIN2 Quarry Buffer Zones
This policy states “Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or
(~2 The proposal is located within an existing built-up area which already encroaches into the buffer zone.”~)
Object - Proposed subsection 2 is not an exception to the national buffer zone policy PPW (5.14.44) and should therefore be deleted.
Delete Subsection 2 “Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or”

2 The proposal is located within an existing built-up area which already encroaches into the buffer zone."

MIN4 Sustainable Mineral Working.
This policy states
"Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will only be permitted where there is a proven national, regional or local need for the mineral and where:"
Object - This policy wording does not reflect PPW (5.11) which seeks to "promote" and not "prioritise" the use of recycled material and secondary aggregates.
Further the word "only" is superfluous and should be deleted.
Reword the policy
"Proposals which PROMOTE (~prioritise~) the use of recycled material and secondary aggregates AS AN ALTERNATIVE TO (~before new sources of~) primary materials (~are developed~) will be SUPPORTED (~favoured~) where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will (~only~) be permitted where there is a proven national, regional or local need for the mineral and where:"

6.388 The wording states "In view of the current landbank of reserves with planning permission at existing mineral working sites within the Vale of Glamorgan, there is no requirement for the Plan to allocate additional areas for limestone extraction."
As stated above, the Evidence Base has not been updated to provide a true representation of the landbank. The permitted reserves being quoted date from 2016 and cannot provide a sound platform upon which mineral provision or requirements can be determined.
Update the evidence as required.

6.389 The wording states "Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured. The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore, the extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (MTAN1 Paragraph 34)." As stated above, the PPW seeks to promote the use of secondary and recycled aggregates. The council has not provided any evidence that secondary and recycled materials are not being maximised, or that primary materials are being used instead of secondary material. There is simply no evidence of "overprovision". Further this is a misquote of MTAN1 Paragraph 34.
Amend the text accordingly.
Reword the text "Proposals which (~prioritise~) PROMOTE the use of recycled material and secondary aggregates (~before new sources of~) AS AN ALTERNATIVE TO primary materials (~are developed~) will be SUPPORTED (~favoured~). (~The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore~), The extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (~(MTAN1 Paragraph 34)~)

Change suggested by respondent:

The permitted reserves being quoted date from 2016 and cannot provide a sound platform upon which mineral provision or requirements can be determined. Update the evidence as required.

Sound: Not specified

Attachments:

Redacted Email Representation - https://valeofglamorgan.oc2.uk/a/3hn

6816 Comment

Document Element: MIN4 – SUSTAINABLE MINERAL WORKING

Respondent: Mineral Products Association (Mr Peter Nicholas Horsley, Planning Director) [689]

Summary:

Paragraph 6.389:

As stated above, the PPW seeks to promote the use of secondary and recycled aggregates. The council has not provided any evidence that secondary and recycled materials are not being maximised, or that primary materials are being used instead of secondary material. There is simply no evidence of “overprovision”. Further this is a misquote of MTAN1 Paragraph 34.
Amend the text accordingly.

Reword the text:

“Proposals which (~prioritise~) PROMOTE the use of recycled material and secondary aggregates (~before new sources of~) AS AN ALTERNATIVE TO primary materials (~are developed~) will be SUPPORTED (~favoured~). (~The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore~), The extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (~(MTAN1 Paragraph 34)~).

Full text:

The Mineral Products Association (MPA) is the trade association for the aggregates, asphalt, cement, concrete, dimension stone, lime, mortar and industrial sand industries. MPA is the sectoral voice for mineral products, covering 100% of UK cement and lime production, 90% of GB aggregates production, 95% of asphalt and over 60% of ready-mixed concrete and precast concrete production. In 2023, the industry supplied £18.4 billion worth of materials and services to the Economy, directly generating £6.7 billion in Gross Value Added (GVA). It is the largest supplier to the construction industry, which generated £141.5 billion in GVA in 2023. Industry production represents the largest materials flow in the UK economy and is also one of the largest manufacturing sectors. For more information visit: www.mineralproducts.org.

Thank you for consulting us on the above document. Mineral supply will be critical to delivering many of the objectives identified in the preferred strategy as well as many of the national infrastructure project proposed such as floating offshore wind in the Celtic Sea. We have major concerns over the reliance on outdated reserve information and the evidence base must reflect up to date reserve and sales statistics, together with projected demand for major developments.

It is disappointing that despite previous representations in 2022 & 2024, the points highlighted have not been addressed. We have therefore, reiterated our concerns below. We have also suggested alternative wording where appropriate.

We welcome further engagement on this matter to address the concerns.

2.50 Regional Technical Statement for Aggregates (2020) Second Review
We support the reference to the RTS (2nd Review), however, as the authority should be aware, WG has commission a further review (RTS3) which is expected to be published at the end of 2026/early 2027
Note the comment as this will be a material consideration as the plan progresses.

5.35 Barry Docks – ABP Masterplan.
Support - We note ABP’s potential for rare earth processing at the Black Rocks Growth Zone and would support such a proposal.
No further comment

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Support - We note the proposals to facilitate sustainable waste management facilities on …. operational or non-operational mineral working sites and would support this.
No further comment

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3 The safeguarding of known resources of sandstone, limestone, sand and gravel (where these occur outside settlements), from permanent development that would unnecessarily sterilise them or hinder their future extraction; and
4 Safeguarding railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate.
Object - Whilst we can support various elements in the proposed policy, we have concerns over the specific wording in it and the supporting text.
Most notably, subsection 2 does not accord with the PPW (5.11.4) in relation to the use of secondary and RECYCLED materials. It is not clear what is meant by “ALTERNATIVE RESOURCES”. This should be replaced. Secondly, PPW “PROMOTES THE USE” and does not reference “favouring proposals. Accordingly, the wording should be amended to

reflect PPW
Also, in relation to subsection 4, the proposed policy does not seek to apply safeguarding to minerals infrastructure as is required by PPW (5.14.7 & 5.24.8). Minerals infrastructure is more than just transportation hubs, it includes the wider processing facilities. Subsection 4 should therefore be amended.
The Policy should be amended to read -
"2 (~Favouring proposals which~) Promote the sustainable use of minerals and encourage the use of secondary and RECYCLED MATERIALS. (~alternative resources~)."
"4 Safeguarding EXISTING AND PLANNED INFRASTRUCTURE, INCLUDING railheads to allow for the potential transportation of minerals by sustainable means and wharf facilities for the landing of marine dredged sand and gravel where appropriate, TOGETHER WITH WIDER MINERALS PROCESSING INFRASTRUCTURE.
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While this statement is factual, we suggest an additional sentence to reflect that Welsh Government has commission a further review of the Regional Technical Statement (RTS3) which has already commenced and is scheduled for completion by the end of 2026.
Add additional sentence to reflect RTS3.

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We have significant concerns that the evidence base for the local plan has not been updated. Whilst RTS2 is undoubtedly material, the statement that "There is an existing landbank of 18.73 million tonnes of crushed rock" is not correct. As stated in the text, this is the landbank as of 31st December 2016. The Council must update its evidence base and provide a landbank figure which reflects the current permitted reserves.
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It is not clear if this tonnage is included in the 18.73mt referred too.
Greater clarity and analysis is required.

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The "slight surplus" referred to was the position at 31st December 2016. The reserve figure needs to be updated.
Update the reserve figures to allow an accurate landbank tobe determined and the need for future allocations to be properly assessed. This should separate out projected aggregate and non-aggregate reserves to ensure clarity.

6.375 The wording states "The RTS2 requires Statements of Sub-regional Collaboration (SSRC) to be prepared by all constituent LPAs within each RTS sub-region. The Vale of Glamorgan along with Bridgend, Cardiff, Rhondda Cynon Taf, Merthyr Tydfil, Caerphilly and the Brecon Beacons National Park forms part of the Cardiff City subregion. The latest position statement for this sub-region (July 2022) indicates that while most authorities in the region, including the Vale of Glamorgan, can meet their apportionment for crushed rock, there is a shortfall of 7.475 million tonnes (Mt) within Cardiff that would require an additional RLDP allocation."
Whilst the position statement referred to may suggest that the apportionment can be adequately met, as highlighted above, there are major concerns that the evidence base being relied upon is out of date. Further, Annex A of the RTS requires that "The LPAs involved should demonstrate, as far as possible, that the SSRC has been produced in consultation with relevant stakeholders, including the Regional Aggregate Working Party (RAWP), as part of the LDP process." This has not been done and as such the SSRC process adopted is fundamentally flawed.
As clearly stated in our previous representations, there are major concerns over the evidence base and the process of relying upon an SSRC which has not followed the requisite protocol.

MIN1 Development in Minerals Safeguarding Areas
Whilst we support the principle of the policy, we suggest the addition of a further subsection addressing the scope for prior extraction. PPW (5.14.7) states "the potential for extraction of mineral resources prior to undertaking other forms of development, have been considered."
Add a further subsection to address the principle of prior extraction.

MIN2 Quarry Buffer Zones
This policy states "Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or

(~2 The proposal is located within an existing built-up area which already encroaches into the buffer zone."~)
Object - Proposed subsection 2 is not an exception to the national buffer zone policy PPW (5.14.44) and should therefore be deleted.
Delete Subsection 2 "Buffer zones have been identified around mineral working sites. Within the identified buffer zones proposals for new development will only be permitted where it is demonstrated that:
1 The proposal would not constrain the operations of the mineral site; or"
2 The proposal is located within an existing built-up area which already encroaches into the buffer zone."

MIN4 Sustainable Mineral Working.
This policy states
"Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will only be permitted where there is a proven national, regional or local need for the mineral and where:"
Object - This policy wording does not reflect PPW (5.11) which seeks to "promote" and not "prioritise" the use of recycled material and secondary aggregates.
Further the word "only" is superfluous and should be deleted.
Reword the policy
"Proposals which PROMOTE (~prioritise~) the use of recycled material and secondary aggregates AS AN ALTERNATIVE TO (~before new sources of~) primary materials (~are developed~) will be SUPPORTED (~favoured~) where this does not have an unacceptable effect on amenity or the environment.
Proposals for the extraction of new primary minerals will (~only~) be permitted where there is a proven national, regional or local need for the mineral and where:"

6.388 The wording states "In view of the current landbank of reserves with planning permission at existing mineral working sites within the Vale of Glamorgan, there is no requirement for the Plan to allocate additional areas for limestone extraction."
As stated above, the Evidence Base has not been updated to provide a true representation of the landbank. The permitted reserves being quoted date from 2016 and cannot provide a sound platform upon which mineral provision or requirements can be determined.
Update the evidence as required.

6.389 The wording states "Proposals which prioritise the use of recycled material and secondary aggregates before new sources of primary materials are developed will be favoured. The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore, the extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (MTAN1 Paragraph 34)." As stated above, the PPW seeks to promote the use of secondary and recycled aggregates. The council has not provided any evidence that secondary and recycled materials are not being maximised, or that primary materials are being used instead of secondary material. There is simply no evidence of "overprovision". Further this is a misquote of MTAN1 Paragraph 34.
Amend the text accordingly.
Reword the text "Proposals which (~prioritise~) PROMOTE the use of recycled material and secondary aggregates (~before new sources of~) AS AN ALTERNATIVE TO primary materials (~are developed~) will be SUPPORTED (~favoured~). (~The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore~), The extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (~(MTAN1 Paragraph 34)~)

Change suggested by respondent:

Reword the text:

"Proposals which (~prioritise~) PROMOTE the use of recycled material and secondary aggregates (~before new sources of~) AS AN ALTERNATIVE TO primary materials (~are developed~) will be SUPPORTED (~favoured~). (~The Council recognises there is a need for a change in the pattern of supply of minerals from primary sources to more sustainable alternatives and that overprovision of primary material as a result of extant permissions and granting new permissions would encourage the unsustainable use of resources. Therefore~), The extraction of new primary minerals in addition to the landbank of permitted reserves will normally only be permitted where it can be demonstrated that there is no practicable substitute material which can be provided at less environmental cost and where there is an identified shortfall in reserves which is justified (~(MTAN1 Paragraph 34)~).

Sound: Not specified

Attachments:

Redacted Email Representation - https://valeofglamorgan.oc2.uk/a/3hn

7123 Support

Document Element: MIN4 – SUSTAINABLE MINERAL WORKING

Respondent: Seth Hill & Son Ltd [1197]
Agent: Highlight Planning

Summary:
Support is given to the policy framework for new workings, extensions and continued mineral extraction subject to environmental safeguards, amenity protection and restoration.

Full text:

REPRESENTATIONS TO THE DEPOSIT VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036 ON BEHALF OF SETH HILL AND SON LTD

1. Introduction

These representations are submitted on behalf of Seth Hill & Son Ltd in response to the Deposit Vale of Glamorgan Replacement Local Development Plan 2021–2036.

They relate specifically to the treatment of Pant-y-Ffynnon Quarry / Seth Hill Quarry, Bonvilston in the Deposit Plan and the associated candidate site assessment process.

The principal concern arises from the Council's candidate site assessment, which states that a positive allocation for mineral working is not included because "The 2nd Review of the Minerals Regional Technical Statement indicates no further allocations are specifically required to be identified within the Vale of Glamorgan RLDP."

That explanation addresses only the narrow issue of whether a fresh minerals allocation is presently required on RTS2 arithmetic. It does not adequately address the planning merits of Pant-y-Ffynnon Quarry itself, nor does it justify a limited or negative treatment of the site in the Deposit RLDP.

These representations therefore object to the overly narrow basis on which the site appears to have been discounted for positive recognition and seek a more balanced and evidence-based treatment of Pant-y-Ffynnon Quarry within the Plan.

2. Site context

Pant-y-Ffynnon Quarry is an established quarrying location with an existing mineral planning history and an established role within the local minerals framework.

The candidate site planning statement explains that the site comprises the full extent of the currently consented Ffynnon Quarry, together with adjoining land to the south. It confirms that the quarry extracts limestone and that the consented quarry element is identified in the adopted LDP as a Quarry Site, with adjoining land within the Buffer Zone and wider Mineral Safeguarding Area. The submission sought to retain the existing LDP status of the consented element and to safeguard the potential for further quarrying to take place on the remainder of the site in the longer term.

The candidate site statement also recorded the continuing active planning context at the site, including application ref. 2021/01379/FUL for the resumption of limestone extraction in the North Quarry, the establishment of an aggregates recycling facility, and restoration of the North Quarry using inert waste materials. That position has since been materially reinforced by the ROMP determination.

Decision notice 2024/00246/ENV is a Determination of New Working Conditions for Pantyffynnon Quarry / Seth Hill Quarry, Bonvilston. The decision provides that the new conditions replace those attached to permissions 97/01084/FUL and 2009/00184/ENV. Condition 1 states that "No operations authorised by this permission, with the exception of restoration and after-treatment works approved under these conditions shall take place after 21 February 2042." The decision also requires a detailed working scheme, revised working programmes every five years, and imposes an annual production limit of 250,000 tonnes.

BP25 independently corroborates the continuing active status of the quarry. It identifies Pantyffynnon in Table 1 as an active quarry with an extraction end date of 21.02.2042. BP25 also confirms that the Vale of Glamorgan is an "important supplier of Carboniferous limestone for general aggregate use".

Taken together, that evidence confirms that the site is not simply a historic quarry with uncertain prospects. It is an active quarry with a recently updated modern conditions framework and an extraction end date beyond the RLDP period.

3. Objection to the candidate site assessment

The Council's candidate site assessment relies on the proposition that no further allocations are specifically required because of the RTS2 position. That reasoning is too narrow.

The statement that no further allocations are specifically required may explain why the Council has concluded that it does not presently need to identify a fresh minerals allocation in order to meet the current quantitative apportionment. It does not, however, address the separate issue of how the Plan should treat an existing quarry site such as Pant-y-Ffynnon Quarry.

The absence of a current need for a new allocation is not the same as a conclusion that an established quarry site should cease to be positively recognised, should no longer be meaningfully safeguarded, or should be treated as strategically unimportant.

The candidate site submission itself demonstrates why the Council's reasoning is incomplete. The submission did not merely seek a fresh allocation on the basis of additional tonnage need. It sought retention of the existing quarry status of the consented element and safeguarding of the wider site for longer-term quarrying potential.

The ROMP decision strengthens that point considerably. A site that has recently been granted updated mineral working conditions and is authorised to continue operations until 21 February 2042 cannot sensibly be treated as though its future role is immaterial simply because current RTS2 figures do not require a further allocation elsewhere in the Vale.

The Council's approach is also difficult to reconcile with national plan-making guidance. The Development Plans Manual states that plans should be based on "robust evidence" so they can be delivered, that candidate sites should not be purposefully excluded from assessment, and that the key objective is whether a promoter has a serious intention to bring the site forward, which links directly to the soundness question "Will the plan deliver?"

In those circumstances, the candidate site assessment appears to conflate two distinct questions: whether a new specific allocation is numerically required under RTS2, and whether an established quarry site should continue to be positively recognised and safeguarded in the Plan. Those questions are not the same. The former may currently be answered in the negative. The latter, in the case of Pant-y-Ffynnon Quarry, should plainly be answered in the affirmative.

4. National and local policy context

The wider policy and evidence framework supports a more positive treatment of Pant-y-Ffynnon Quarry than is reflected in the candidate site assessment.

PPW states that it is in the interests of the minerals industry that landbanks reflect "real possibilities for future mineral working" and adds that authorities should provide "a clear guide to where nonenergy mineral extraction is likely to be acceptable".

MTAN1 explains that development plans should identify "dormant reserves" separately and states that "A more realistic landbank assessment is the aim of this process" so that a more accurate picture emerges of reserves "that are likely to have real potential for future working". It also states that the future landbank should include land specifically allocated for the working of aggregates as an "extended landbank".

The SWRAWP RTS reinforces the point that reserve arithmetic is not the whole picture. It states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects, changes in planning policy, protected site designations or other permitting constraints. This is particularly relevant given the increasingly important role of NRW licensing and abstraction controls, including quarry dewatering considerations, which may mean that some reserves are no longer as readily available or economically viable as historic landbank figures imply. Accordingly, apparent reserve sufficiency in quantitative terms may overstate the extent of genuinely deliverable supply. SWRAWP also confirms that dormant reserves "must be counted separately".

The Deposit RLDP's own framework is consistent with that broader policy approach. The Plan safeguards known limestone resources and retains quarry buffer zones so that incompatible development does not prejudice mineral operations or future working. BP25 explains that the RLDP safeguards finite mineral resources for future generations and protects them from permanent development that could sterilise or hinder extraction.

The Plan also provides a detailed framework for sustainable mineral working, including new workings, extensions and the reworking or reopening of old workings. That mechanism is intended to deal with the detailed merits of mineral proposals, including environmental effects, amenity, hydrology, transport and restoration. There is therefore no sound policy basis for adopting an unduly negative position toward Pant-y-Ffynnon Quarry at plan-making stage simply because no fresh allocation is currently required.

5. Benefits of continued extraction at Pant-y-Ffynnon Quarry

Continued extraction at Pant-y-Ffynnon Quarry would give rise to a number of important site-specific and strategic benefits.

PPW expressly recognises the planning advantages of extending established quarry sites. Paragraph 5.14.48 states that "The presence of an existing quarry should be a material consideration when considering a proposal for an extension. There may be benefits to extending a site in terms of shared infrastructure, for instance, as opposed to working a new greenfield site." That principle is directly relevant to Pant-y-Ffynnon Quarry. The site is an existing quarrying location with an established operational and planning context, and any continued working or extension would be able to build upon that existing quarrying footprint, associated infrastructure and minerals land use relationship. In planning terms, that is materially preferable to directing future working to an entirely new greenfield location, and it reinforces the case for the Deposit RLDP to continue to recognise the site positively within the minerals strategy rather than treating it as strategically unimportant simply because no fresh allocation is currently required.

The site is an existing quarrying location with an established mineral planning history. Continued extraction would therefore amount to the continuation and proper management of an existing quarrying use rather than the introduction of mineral development into a wholly new location. That is a material land use consideration.

The candidate site statement identifies the effective use of mineral resources and the avoidance of sterilisation of unworked reserves as clear benefits of the proposal. That carries substantial weight. Mineral resources can only be worked where they occur, and it is generally more efficient and sustainable to make prudent use of an established quarry resource than to disregard it while pressure for future supply is directed elsewhere.

The site can also contribute to continuity and resilience of supply. The candidate site statement expressly states that continued quarrying at the wider site would provide continuity in mineral supply at this location and contribute to resilience through the provision of a consistent supply over the plan period and beyond. Existing operational or consented sites will often provide a more realistic and deliverable source of continuing supply than wholly new mineral sites.
Continued extraction would also support the construction industry through the provision of an adequate and continuous supply of minerals. This sits comfortably with BP25's recognition that the Vale is an "important supplier of Carboniferous limestone for general aggregate use" .
There are also local economic benefits. The candidate site submission refers to the maintenance of local economic benefits. An established quarrying operation supports employment, haulage, plant use, contractors and associated supply chains. Continued recognition of the site therefore supports local economic activity as well as mineral supply.
Environmental and restoration benefits are also relevant. The candidate site statement refers to benefits through new planting and habitat creation and treats restoration as part of the overall site concept. Continued quarrying should therefore not be considered solely in terms of extraction. It also creates the opportunity to secure restoration, habitat creation, landscape management and long-term after-use benefits through a modern planning framework.
A further important benefit is that any continued working would proceed under modern planning controls. The ROMP approval confirms that continued extraction has been reviewed through a contemporary planning process, that updated conditions now regulate the site, that the quarry must be worked in accordance with an approved working scheme, that annual production is capped at 250,000 tonnes, and that extraction may continue until 21 February 2042. That provides a robust and sustainable planning basis for future quarrying.
Continued recognition of Pant-y-Ffynnon Quarry within the Deposit RLDP would also ensure that the site remains properly integrated into the authority's safeguarding, buffer and minerals policy framework. That would provide clarity, consistency and transparency in the Plan.
6. Changes sought
The Deposit RLDP should not treat the absence of a current RTS2 requirement for further allocations as determinative of the planning treatment of Pant-y-Ffynnon Quarry.
The Plan should continue to recognise the consented quarry element positively within the minerals strategy.
The wider site should remain properly safeguarded within the minerals safeguarding and quarry buffer framework.
The supporting text should make clear that the absence of a new allocation reflects only the current RTS2 quantitative position and not any conclusion that the site is unsuitable in principle for continued quarrying.
The Plan should rely on its existing minerals development management policies, together with the ROMP framework and any future application process, to assess the detailed merits of continued working, associated development and restoration proposals at the site.
That approach would better reflect the site's planning status, the candidate site evidence, the ROMP determination and the wider objective of maintaining a sound and effective minerals strategy in the Vale of Glamorgan.
7. Conclusion
The Council's reliance on the statement that the 2nd Review of the Minerals Regional Technical Statement indicates that no further allocations are specifically required within the Vale of Glamorgan RLDP is too narrow a basis on which to assess Pant-y-Ffynnon Quarry.
That statement may explain why the Council has not identified a new formal mineral allocation on numerical grounds. It does not, however, justify removing or diluting positive recognition of an existing quarry site with an established planning status, a recent ROMP approval permitting continued extraction until 21 February 2042, and clear evidence of continuing supply, economic and restoration benefits.
Pant-y-Ffynnon Quarry should therefore continue to be positively recognised as part of the Vale of Glamorgan's minerals framework. The Deposit RLDP should distinguish clearly between the absence of a current need for a fresh allocation and the continuing strategic relevance of an established quarry site. In the case of Pant-y-Ffynnon Quarry, the latter plainly remains.
8. Summary
 Overall minerals strategy: Support in part / Object in part.
Seth Hill & Son Ltd supports the general objective of maintaining an adequate minerals supply and managing mineral resources through a plan-led framework. Objection is taken to the extent that the Deposit RLDP relies too narrowly on the RTS2 conclusion that no further allocations are specifically required, without properly reflecting the continuing role of Panty-Ffynnon Quarry as an existing quarry site with ongoing strategic relevance.
 Strategic minerals policy / supply and safeguarding approach: Support in part / Object in part.
The strategic objective of securing a continuous supply of minerals and safeguarding mineral resources is supported. Objection is taken insofar as that strategic approach is not properly applied to Pant-y-Ffynnon Quarry, which should continue to be recognised positively within the minerals framework notwithstanding the absence of a current need for a fresh allocation.
 Policy MIN1 – Mineral safeguarding areas: Support.

Support is given to the safeguarding of limestone resources from unnecessary sterilisation. That approach is directly relevant to Pant-y-Ffynnon Quarry, particularly given that the candidate site submission sought to retain quarry status for the consented element and to safeguard the wider site for longer-term quarrying.
 Policy MIN2 – Quarry buffer zones: Support.
The principle of retaining quarry buffer zones is supported because it protects existing and future quarrying operations from encroachment by incompatible development. Continued positive recognition of Pant-y-Ffynnon Quarry sits logically alongside that buffer framework.
 Policy MIN4 – Sustainable mineral working: Support in principle.
Support is given to the policy framework for new workings, extensions and continued mineral extraction subject to environmental safeguards, amenity protection and restoration. Pant-y-Ffynnon Quarry is capable of being assessed under that framework, and detailed issues should be dealt with through the policy and application process rather than by withholding positive plan recognition now.
 Candidate Site Assessment – Pant-y-Ffynnon Quarry: Object.
Objection is taken to the candidate site assessment insofar as it relies on the statement that no further allocations are specifically required under RTS2 as the reason for not taking the site forward positively. That reasoning is too narrow because it fails to engage with the fact that the site is an existing quarrying location, that the candidate submission sought retention of quarry status as well as longer-term safeguarding, and that the site has benefited from ROMP approval ref. 2024/00246/ENV, which permits operations until 21 February 2042.
 Status of the existing quarry site: Object to insufficient recognition.
Seth Hill & Son Ltd objects to any approach which treats Pant-y-Ffynnon Quarry as strategically unimportant simply because no new allocation is numerically required. The consented quarry element should continue to be positively recognised in the Plan, reflecting its existing planning status, updated ROMP conditions and ongoing minerals planning context.
 Benefits of continued extraction at Pant-y-Ffynnon Quarry: Positive material consideration.
Continued extraction would make productive use of an existing quarry site, avoid sterilisation of unworked reserves, provide continuity and resilience of mineral supply, support local economic benefits and allow restoration-led environmental gains through planting, habitat creation and long-term after-use. Those benefits weigh in favour of continued positive recognition of the site within the Deposit RLDP.
 Soundness and evidence base: Object to insufficiently evidence-led treatment.
The Development Plans Manual requires plans to be based on “robust evidence” so they can be delivered and links candidate sites directly to the soundness question “Will the plan deliver?” The current treatment of Pant-y-Ffynnon Quarry does not fully reflect the evidence
before the Council on the site’s planning status, deliverability and continuing operational role.
 National policy compliance – PPW, MTAN1 and SWRAWP: Support in principle / Object to incomplete application.
The broad alignment of the Deposit RLDP with national minerals policy is supported. The objection is that the Plan does not go far enough in applying PPW’s reference to “real possibilities for future mineral working”, MTAN1’s requirement for a “more realistic landbank assessment”, and SWRAWP’s warning that “Caution must be exercised in using these landbank figures” when considering the ongoing role of Pant-y-Ffynnon Quarry.
 Overall position: Support in part / Object in part.
In overall terms, Seth Hill & Son Ltd supports the Deposit RLDP’s broad minerals framework. The objection is a focused one: the Plan should more clearly distinguish between the absence of a current need for a fresh mineral allocation and the continuing strategic relevance of Panty-Ffynnon Quarry as an established quarry site with planning status, ongoing supply potential and a recent ROMP approval extending operations beyond the plan period.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Deposit Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3x9
Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3xb
Email Representation - https://valeofglamorgan.oc2.uk/a/3xc

7131 Support

Document Element: MIN4 – SUSTAINABLE MINERAL WORKING
Respondent: Tom Prichard (Holdings) Ltd [3738]
Agent: Highlight Planning

Summary:

The respondent supports the policy framework for future reworking or reopening of old workings, including the need for acceptable impacts, restoration and beneficial after-use.

Full text:

REPRESENTATIONS TO THE DEPOSIT VALE OF GLAMORGAN REPLACEMENT LOCAL DEVELOPMENT PLAN 2021–2036 ON BEHALF OF TOM PRICHARD (HOLDINGS) LTD

1. Introduction

These representations are submitted on behalf of Tom Prichard (Holdings) Ltd in respect of the Deposit Vale of Glamorgan Replacement Local Development Plan 2021–2036. They relate specifically to the Plan's minerals strategy and policy framework, the treatment of dormant mineral sites, and the candidate site assessment and supporting evidence relating to Argoed Isha Quarry, Llansannor.

The respondent supports the broad direction of the Deposit RLDP minerals framework, but contends that the Plan is unsound in part in the way it presently treats Argoed Isha Quarry. The central point is straightforward: the Council's own evidence accepts that usable reserves remain at the site, that those reserves could still be extracted if required, and that the site has the potential to be reworked. Yet that conclusion is not carried through into a sufficiently positive and coherent plan-led position.

The objection is therefore not to the principle of maintaining a minerals strategy founded on safeguarding, environmental protection and modern control of extraction. Nor is it suggested that the Plan must necessarily allocate Argoed Isha as a new specific site simply because a candidate site was submitted. Rather, the objection is that the Deposit RLDP does not properly reflect the evidential position it has itself reached. It acknowledges that Argoed Isha should not be made subject to a Prohibition Order, but stops short of recognising clearly that the site remains a dormant limestone quarry with continuing mineral significance, realistic future reactivation potential and scope for future working under modern planning controls, restoration obligations and biodiversity enhancement.

2. Site context and planning status

Argoed Isha is a long-established limestone quarry. The candidate site planning statement explains that the site has a historic quarry planning status, that recommencement would require updated working conditions, and that the site was promoted through the candidate site process precisely because there remains interest in recommencing mineral extraction. The same statement records the local planning authority's earlier position that, in relation to a previous proposal, the Council could only seek a Prohibition Order if it was satisfied that resumption of extraction was unlikely, but that "this requirement is not met" at Argoed Isha because of continuing interest in re-opening the quarry. It also records the mineral adviser's view that "The site currently has planning permission for a quarry" and that, absent relinquishment, "the permission to quarry remains valid".

The candidate site material also addresses availability and deliverability. It states that the site is available for development, that the proposal is considered viable and deliverable owing to the underlying need for the mineral, and that the site is a brownfield / underutilised site. It further notes that the proposal comprises mineral development within a mineral safeguarding area and within a site which benefits from a planning permission for quarrying, such that it is considered acceptable in principle. Those points are important because they show that Argoed Isha is not simply a theoretical reserve detached from any realistic prospect of future use.

3. Soundness and the role of evidence

The Development Plans Manual states that plans should be based on robust evidence so they can be delivered and that LPAs must be able to demonstrate, in broad terms, that the plan is deliverable with no significant impediments to implementation. It also emphasises the importance of a detailed candidate site process and of ensuring delivery and viability are embedded in that process from the outset. Elsewhere, the Manual explains that the plan-making process should prepare more effective, efficient and deliverable plans and refers expressly to the tests of soundness which must be satisfied if a development plan is to be recommended for adoption.

Those principles matter here because the Council had before it a candidate site submission which set out the site's planning status, constraints, deliverability and rationale for retention as a mineral site. It also had its own local evidence in BP25 and the wider regional evidence from RTS2, the sub-regional collaboration work and SWRAWP. In those circumstances, a sound plan ought to explain clearly how that evidence has informed the Council's chosen strategy for Argoed Isha. In the respondent's submission, the Deposit RLDP presently falls short because it recognises part of the evidence, but not its full implications. The Plan is therefore unsound in part because it is not fully justified by the evidence and is not as effective as it should be in setting out a coherent future approach to this dormant but still viable mineral resource.

4. National policy context – Planning Policy Wales

Planning Policy Wales establishes the national context for these representations. It requires planning authorities to maintain landbanks for non-energy minerals in demand and states that, for crushed rock, a minimum ten-year landbank should be maintained through the plan period unless agreement is reached for other authorities to make a compensating increase in provision. PPW also recognises that individual authority boundaries are not always an adequate basis for landbank policy where environmental constraints are too important or workable resources too limited, in which case authorities must agree a joint approach with neighbouring authorities in line with regional arrangements.

PPW is especially important in relation to inactive sites. Paragraph 5.14.17 provides that inactive sites with planning permission for future working which are considered unlikely to be reactivated should be identified in the development plan and should be the subject of a suitable strategy, which could include prohibition orders, restoration and aftercare proposals, and a suitable proposed after-use.

Paragraph 5.14.18 then states that “It is in the interests of the minerals industry that landbanks reflect real possibilities for future mineral working” and adds that, where sites have been inactive and “there is no prospect of future working”, authorities should consider the use of prohibition orders.
That distinction is central to the present case. The Council has not concluded that there is no prospect of future working at Argoed Isha. Quite the contrary: BP25 states that usable reserves remain at the site, that they could be extracted if required, and that they have the potential to be reworked. The logic of PPW is therefore that Argoed Isha is not a site to be treated as effectively closed or exhausted. It remains a site with continuing mineral relevance, albeit one that would require modern conditions and a fresh scheme of workings before any extraction could recommence.
PPW is also directly relevant to areas of future working. Paragraph 5.14.19 states that “Where necessary, planning authorities should provide a clear guide to where non-energy mineral extraction is likely to be acceptable” and that policies and proposals should cover mineral resources “which are currently used or which may need to be used in the foreseeable future”. It further explains that such areas should be clearly identified on a proposals map and may take the form, in order of preference, of specific sites, preferred areas or areas of search.
The respondent does not suggest that PPW compels the Council to identify Argoed Isha as a specific site. However, PPW plainly supports a more positive and more explicit plan-led recognition of sites which retain real future mineral potential. Once the Council’s own evidence accepts that Argoed Isha is such a site, it is difficult to reconcile a largely passive policy response with the national expectation that development plans should give a clear guide to where future mineral working may be acceptable.
5. National policy context – MTAN1
MTAN1 reinforces the need for a realistic and evidence-based approach to landbanks and dormant sites. It explains that a landbank is composed of permitted reserves at active and inactive sites, and that development plans should include an assessment of both the current and future landbank.
Paragraph 47 then states that development plans should identify those sites that are dormant and count these as “dormant reserves” to be clearly shown in landbank calculations as a separate category. Paragraph 48 continues by stating that a more realistic approach is required, observing that extensive historic landbanks can perpetuate unsustainable supply patterns if left unaltered. MTAN1 therefore states that “A more realistic landbank assessment is the aim of this process” so that a more accurate picture is obtained of permitted reserves “that are likely to have real potential for future working”.
That policy language is highly material. It confirms that dormant reserves are not irrelevant simply because they are not counted within the active landbank. They are to be identified separately and realistically assessed. That is precisely the position that should be taken with Argoed Isha. The Council has already undertaken the essential assessment in substance through BP25 and has concluded that usable reserves remain and that the site has the potential to be reworked. MTAN1 therefore supports a more nuanced and more positive treatment of the site than a simple “no allocation required” conclusion.
MTAN1 also recognises that in some authorities it may not be possible or acceptable to provide an adequate current or extended landbank because of environmental designations, limited suitable resources, or amenity considerations, and that RAWPs should consider the environmental capacity of authorities to supply aggregates. This is an important reminder that reserve arithmetic is not the only issue. Deliverability, environmental capacity, and the practical availability of reserves remain relevant.
6. Apportionment and Plan Period
The regional and sub-regional evidence does not undermine the respondent’s case. It explains why there is no present quantitative requirement for a further minerals allocation in the Vale, but it does not justify a negative or dismissive treatment of Argoed Isha.
BP25 records the RTS2 and Statement of Sub-Regional Collaboration position for the Cardiff City subregion. Table 5 identifies the Vale of Glamorgan apportionment for crushed rock as 17.05 million tonnes over 25 years, with existing permitted reserves of 18.73 million tonnes at the end of 2016 and a minimum allocation needed of 0, alongside 13 million tonnes of additional reserves at dormant sites. BP25 then states that, based on those figures, the SSRC identifies that the Vale of Glamorgan does not require any allocations for future workings of crushed rock to be identified within the RLDP.
Based on the Development Plans Manual, when a plan is adopted, there should be at least 10 years of the plan period remaining.
On the Council’s current timetable, adoption is only anticipated for August/September 2027, and those post-Deposit stages are expressly identified in the Delivery Agreement as indicative, because they depend on external factors including the number of representations received and the examination process. The Deposit Plan runs only to 2036. That means that, even if the Council hits its best-case programme and adopts in September 2027, the Plan would have only about 8 years and 3 months left to run. That is already below the DPM expectation of at least 10 years remaining at adoption. Any slippage would make that position worse.
Based on the current timetable, an end date of 2038 (with associated review of mineral reserves) would therefore ensure a sound plan.
Notwithstanding our comment in respect of the Plan Period, we remain concerned of how the Plan should treat a dormant site which the Council accepts has remaining usable reserves and realistic reactivation potential. Nor does it justify treating Argoed Isha as though it lacked future significance.
The respondent’s case is therefore not that the RTS2 figure is wrong, but that it has been taken too

far. A conclusion that no additional formal allocation is presently required is not the same thing as a conclusion that the site has no future role.

7. BP25 – the Council's own minerals evidence

BP25 is the most important local evidence document for present purposes. It records that the Vale of Glamorgan is an "important supplier of Carboniferous limestone for general aggregate use". It then addresses dormant mineral sites in the Vale. Paragraphs 5.48 to 5.50 explain that many dormant sites have not been worked for many years and are considered unlikely to be worked in the future; accordingly, the Council intends to serve Prohibition Orders on those sites, which would provide certainty for nearby residents and remove reserves which are not realistically available. BP25 also explains that the level of reserves at dormant sites is not counted in the landbank.

Crucially, BP25 then distinguishes Argoed Isha from that general class of dormant sites. Paragraph 5.51 states: "While Argoed Isha quarry is classified as 'dormant', useable reserves remain at the site and could be extracted if required." It goes on to record that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030, but then adds: "While the reserves at the site are not included in the current landbank, they have the potential to be reworked and therefore a Prohibition Order will not be served at Argoed Isha Quarry until the current circumstances change."

That is a very clear evidential conclusion. BP25 does not simply refrain from prohibiting the site without explanation. It positively explains why Argoed Isha is different: usable reserves remain, they could be extracted if required, and they have the potential to be reworked. In the respondent's submission, that conclusion requires a correspondingly clearer and more positive policy response within the Deposit RLDP than is presently provided.

BP25 is also supportive on restoration and aftercare. It states that the serving of Prohibition Orders is intended to provide certainty and, where necessary, restoration of sites may be sought. More broadly, the background paper recognises the importance of sustainable minerals management and balancing mineral extraction with environmental protection and community well-being. That policy background is entirely consistent with the respondent's case that any future working at Argoed Isha should be controlled through a modern framework of environmental safeguards and restoration-led after-use.

8. SWRAWP Annual Report 2024

The SWRAWP Annual Report 2024 is also highly relevant because it warns against over-reliance on headline landbank figures. Paragraph 4.10 states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects that may restrict the availability of certain reserves, nor constraints arising from changes in planning policy, protected site designation or other non-planning permitting requirements. Paragraph 4.11 then confirms that dormant sites have not been included in landbank calculations and that local planning authorities should carry out their own assessments of the likelihood of reactivation, but that in any event "dormant reserves must be counted separately".

That evidence materially supports the respondent's case. It shows that the statement "no further allocations are specifically required" is not, in itself, the end of the analysis. Landbank figures are a starting point, but they do not tell the whole story. Questions of practical availability, regulatory and environmental constraints elsewhere, and the separate role of dormant reserves remain relevant. Argoed Isha therefore retains importance as part of the broader mineral resource picture even though it is not part of the active landbank.

9. Response to the Council's candidate site assessment

The Council's candidate site assessment records that a positive allocation for mineral working is not included because "the 2nd Review of the Minerals Regional Technical Statement indicates no further allocations are specifically required to be identified within the Vale of Glamorgan RLDP". That point should be addressed directly.

The respondent accepts that the RTS2 position explains why the Council may have concluded that there is no immediate need for a fresh mineral allocation in quantitative terms. However, that is not a sufficient reason, on its own, to reject a more positive policy treatment of Argoed Isha or to give the impression that the site lacks future significance. BP25 itself shows why. It records both that the Vale does not presently require additional allocations and, separately, that Argoed Isha retains remaining usable reserves and has the potential to be reworked. Those two propositions are not inconsistent. They point toward a more nuanced and more accurate conclusion: namely, that Argoed Isha may not need to be allocated now to meet a current numerical shortfall, but it remains a dormant limestone reserve of continuing strategic relevance that should be positively recognised within the Plan.

That approach is also supported by PPW, MTAN1 and SWRAWP. PPW states that landbanks should reflect "real possibilities for future mineral working" and that prohibition orders are appropriate where there is "no prospect of future working". MTAN1 requires dormant reserves to be separately identified and assessed so as to achieve "A more realistic landbank assessment". SWRAWP says that "Caution must be exercised" in using landbank figures and that dormant reserves must be counted separately. Those documents all point to a need for a broader planning judgment than simple reserve arithmetic.

Accordingly, the flaw in the candidate site reasoning is not that it refers to the RTS2 position, but that it appears to stop there. In the respondent's submission, the sounder and more evidence-based approach would have been either to give the site more positive recognition in the Plan's supporting text, or at the very least to make clear that the site was not allocated because no immediate additional

allocation was required, not because the site lacked merit, availability or future potential.
Moreover, SWRAWP reinforces the point that reserve arithmetic is not the whole picture. It states that "Caution must be exercised in using these landbank figures" because the calculation does not take account of geographical or operational aspects, changes in planning policy, protected site designations or other permitting constraints. This is particularly relevant given the increasingly important role of NRW licensing and abstraction controls, including quarry dewatering considerations, which may mean that some reserves are no longer as readily available or economically viable as historic landbank figures imply. Accordingly, apparent reserve sufficiency in quantitative terms may overstate the extent of genuinely deliverable supply.
10. The existing temporary training permission does not sterilise the reserve
BP25 states that a Construction Plant Competence Training Centre has operated at the site since 2016 and has temporary planning consent until 2030. The significance of that point is not that the site has permanently moved away from minerals. The significance is the opposite: BP25 records the temporary training use while simultaneously concluding that usable reserves remain and may be reworked, and that a Prohibition Order should therefore not be served.
In planning terms, a temporary training use of this kind cannot properly be treated as sterilising the mineral reserve. PPW's safeguarding policy is concerned with preventing sterilisation by permanent development. A time-limited interim use, particularly one expressly acknowledged in BP25 as coexisting with a potentially reworkable reserve, does not extinguish the underlying mineral significance of the site. The temporary training use should therefore be understood as an interim overlay rather than a permanent change in land use character.
11. Benefits of continued extraction at Argoed Isha Quarry
Continued extraction at Argoed Isha Quarry would give rise to a number of site-specific and strategic benefits which the Deposit RLDP should recognise when considering the future role of the site.
The site is not a greenfield mineral proposal on an entirely undeveloped site. It is an existing quarry with a long-established mineral planning history and extant mineral status in principle, subject to updated modern conditions. The principle of mineral working at the site is therefore already established in land use terms, and the future reworking of the reserve would represent the continuation of an existing mineral use rather than the introduction of quarrying into a wholly new location. That is a material distinction when considering the appropriateness of retaining the site as a realistic future mineral resource.
Continued extraction would also assist in making use of a proven local limestone resource in the Vale of Glamorgan, rather than forcing greater reliance on more distant or more constrained sources. BP25 confirms that the Vale is an "important supplier of Carboniferous limestone for general aggregate use". In practical terms, continued extraction at Argoed Isha would accord with the proximity principle by helping to meet demand from a comparatively well-located source close to markets in the Vale and wider Cardiff area, rather than depending unduly on more remote sources or on supply patterns that may become more constrained over time.
The site would also contribute to the resilience and flexibility of the wider minerals supply position. Even if no immediate additional allocation is numerically required under RTS2, national and regional policy make clear that landbank figures are not the only relevant consideration. A dormant quarry with remaining usable reserves provides contingency, flexibility and productive capacity in the event that supply circumstances change during the plan period. This is especially important where SWRAWP warns that landbank figures do not capture geographical, operational, policy or other permitting constraints, and where MTAN1 requires a realistic view of reserves with future potential. Argoed Isha therefore has value not merely as a theoretical reserve, but as part of a resilient longer-term supply position.
Continued extraction at Argoed Isha would also support local supply chains and a more diverse quarrying sector. The candidate site submission identified the benefit of maintaining provision from a range of operators, including smaller and medium-sized businesses, rather than relying only on a limited number of larger established sites. In planning terms, that diversity is relevant to continuity of supply, competition, responsiveness to local demand and the overall resilience of the minerals sector in the Vale and wider region.
A further benefit is that any future extraction would be carried out under modern planning control rather than being left sterilised or underused. If the site is reworked in future, that would necessarily be through a fresh scheme of modern conditions and under the policy framework of the RLDP and national minerals policy. Issues such as traffic, hydrology, hydrogeology, ecology, landscape, amenity, blasting, dust, restoration and long-term aftercare would all be capable of being addressed through a contemporary planning and environmental control regime. That is an important benefit in itself, because it means any future extraction would not take place under outdated historic controls, but under a modern framework designed to secure sustainable mineral working.
Continued extraction would also create the opportunity for a comprehensive restoration and aftercare strategy delivering environmental gains. PPW recognises that restoration and aftercare proposals for inactive sites may include natural re-vegetation for nature conservation and ecological interests. BP25 records that restoration may be sought where necessary. In practice, any future extraction proposal at Argoed Isha could be accompanied by a restoration-led scheme involving landform improvement, habitat creation, ecological enhancement and long-term stewardship. The site should therefore not be seen simply as a mineral reserve, but as a place where carefully managed extraction

could unlock biodiversity, landscape and geodiversity benefits over time.
The site also represents the productive use of an underutilised brownfield quarry. The candidate site material identifies it as a brownfield / underutilised site. In land use terms, there is a clear logic in making effective use of an existing quarried landscape with established mineral status, rather than placing additional pressure on wholly undeveloped land elsewhere. In this case, the Council's own evidence confirms the key factor: usable reserves remain and the site has the potential to be reworked.
There is finally a longer-term safeguarding benefit in recognising the case for continued extraction. PPW requires mineral resources to be safeguarded to prevent sterilisation by permanent development, and makes clear that landbanks should reflect "real possibilities for future mineral working". Positive recognition of the benefits of continued extraction at Argoed Isha is therefore entirely consistent with the basic objectives of national minerals policy: prudent use of finite mineral resources, maintenance of flexibility in supply, and avoidance of circumstances in which sites with genuine future potential are prematurely written off.
12. Restoration, aftercare and biodiversity gain
The respondent's case is not simply that Argoed Isha should be recognised as a future mineral source. It is also that any future reworking can and should be subject to a modern restoration-led scheme capable of securing environmental gains.
PPW contemplates restoration and aftercare proposals for inactive sites, including natural revegetation for nature conservation and ecological interests. BP25 records that, where necessary, restoration may be sought at dormant sites. The candidate site material also identifies that the site is not close to internationally or nationally important wildlife sites, while noting the presence of existing ecological and geological interests that could be appropriately managed through buffers, mitigation and future planning controls. These are precisely the kinds of circumstances in which a carefully designed extraction and restoration scheme could deliver meaningful biodiversity and geodiversity benefits alongside the prudent working of the remaining mineral resource.
Future working at Argoed Isha should therefore not be viewed in binary opposition to environmental enhancement. The modern policy framework envisages integrated mineral development in which extraction, restoration and aftercare are part of a single coherent process. That is an additional reason why the Plan should positively recognise the site's continuing potential rather than leaving it in a policy grey area.
13. Overall conclusion
The evidence base points clearly to a more positive and more coherent treatment of Argoed Isha than is presently provided in the Deposit RLDP.
PPW says that landbanks should reflect "real possibilities for future mineral working" and that prohibition orders are appropriate where there is "no prospect of future working". MTAN1 requires a separate assessment of "dormant reserves" and seeks "A more realistic landbank assessment". SWRAWP states that "Caution must be exercised in using these landbank figures". BP25 records that "useable reserves remain at the site and could be extracted if required" and that they "have the potential to be reworked". The Development Plans Manual requires plans to be based on robust evidence and to be deliverable.
Against that background, the Council's reliance on the proposition that the RTS2 indicates no further allocations are specifically required does not dispose of the issue. It may explain why there is no immediate need for a fresh mineral allocation, but it does not justify a passive or dismissive treatment of Argoed Isha. The more sound and evidence-based approach is to recognise that, whilst no additional formal allocation is presently required, Argoed Isha remains a dormant limestone quarry with usable reserves and realistic future reactivation potential, capable of coming forward in future under modern policies for sustainable working, restoration and aftercare.
14. Summary
These representations contend that, whilst the Deposit RLDP minerals strategy is broadly supported, the Plan is unsound in part in its treatment of Argoed Isha Quarry. In particular, the objection goes principally to whether the Plan is justified by the evidence and whether it is effective in delivery. The objection also concerns consistency with national minerals policy to the extent that the Deposit RLDP does not fully reflect PPW and MTAN1 in positively planning for the safeguarding and potential future working of this identified limestone resource.
 Strategic Policy SP18 – Minerals Supply and Safeguarding: Support in part / Object in part.
The respondent supports the overarching strategy of maintaining a continuous supply of minerals, safeguarding mineral resources and avoiding sterilisation. However, objection is taken insofar as the strategy does not carry through the Council's own evidence that Argoed Isha retains usable reserves and future potential for reworking.
 Policy MIN1 – Mineral Safeguarding Areas: Support.
This policy is supported because it reflects national policy by safeguarding limestone resources from permanent development that would sterilise them or hinder future extraction.
That approach is directly relevant to Argoed Isha, which remains a safeguarded resource with extant mineral significance.
 Policy MIN2 – Quarry Buffer Zones: Support.
The principle of protecting mineral operations from encroachment by incompatible development is supported. If Argoed Isha is to remain a realistic future source of limestone,

the Plan should continue to avoid prejudice to its potential reactivation.
 Policy MIN3 – Dormant Mineral Sites: Support in principle / Object in part.
The respondent supports the Council's decision not to serve a Prohibition Order at Argoed Isha. That is plainly the correct approach because BP25 confirms that usable reserves remain and may be reworked. However, objection is taken to the absence of stronger wording recognising that the site remains a realistic future source of limestone.
 Policy MIN4 – Sustainable Mineral Working: Support in principle.
The respondent supports the policy framework for future reworking or reopening of old workings, including the need for acceptable impacts, restoration and beneficial after-use. Argoed Isha is capable of being assessed under that type of modern policy framework.
 Supporting text to the dormant quarry provisions / paragraph 6.386 equivalent approach: Object in part.
The Plan is correct to recognise that the reserves at Argoed Isha could be reworked in future. The objection is that this conclusion is not carried through into a fuller and more positive policy narrative.
 Plan Period: Object.
Amend in line with the Development Plans Manual such that there are at least 10 years remaining at adoption.
 Candidate Site 411 – Argoed Isha Quarry: Object.
The respondent objects to the candidate site assessment insofar as the site appears to have been rejected solely or mainly because RTS2 indicates that no further allocations are specifically required. That is too narrow an approach and does not properly reflect PPW, MTAN1, SWRAWP or BP25's conclusion that usable reserves remain and may be reworked.
 Minerals Background Paper BP25: Support in part / Object in part.
BP25 is supported where it correctly records that Argoed Isha is dormant, that usable reserves remain, and that the site has the potential to be reworked. Objection is taken only insofar as the Deposit RLDP does not fully reflect the implications of that evidence in a more positive and coherent plan-led position.
 Temporary training use: Clarificatory comment in support of the representation.
The current training use does not sterilise the limestone reserve. BP25 records the temporary training use until 2030 while also confirming that usable reserves remain and that the site may be reworked. It should therefore be treated as an interim use only.
 Benefits of continued extraction at Argoed Isha: Positive material consideration.
Continued extraction at Argoed Isha would make productive use of an existing dormant quarry with remaining usable reserves, support local and sub-regional limestone supply from a Vale source, contribute to flexibility and resilience in the minerals strategy, and enable future working to proceed under modern planning controls with restoration, aftercare and biodiversity enhancement.
 Overall position on the Deposit RLDP minerals strategy: Support in part / Object in part.
In overall terms, the respondent supports the Deposit RLDP's general minerals framework. The objection is a precise and limited one: the Plan should more clearly and positively recognise Argoed Isha as a dormant quarry with usable reserves, realistic reactivation
potential, and scope for a future scheme of continued extraction and restoration, such that the Plan is properly justified by its evidence base and effective in delivering a resilient minerals strategy over the plan period.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Candidate Sites Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3j3
Email Representation - https://valeofglamorgan.oc2.uk/a/3j4

5177 Object

Document Element: SP19 - GREEN INFRASTRUCTURE

Respondent: Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]

Summary:

Policy SP19 should explicitly reference the need for development to be accompanied by a Green Infrastructure Statement.
PPW12 requires decision makers to apply the step wise approach to GI, with enhancement secured at every stage where possible, there is no distinction made between the quality of the GI assets – the qualification in the policy statement that states proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure should be redrafted to remove the quality reference. The need to avoid an impact in the first instance should also be explicitly incorporated into the policy.

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.
Without prejudice to the Minster's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.
National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.
After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:
Annex 1 – General Conformity with Future Wales
• No significant concerns
Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)
• Spatial Strategy and Primary Settlements
• Housing and Economic Growth Levels – Regional Collaboration
• Maximising Affordable Housing Provision
• Delivery & Implementation – General
• Gypsy and Travellers
• Renewable Energy
• Minerals
• Best and Most Versatile Agricultural Land (BMV)
• Welsh Language

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.
My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.
Yours sincerely,
Neil Hemington
Chief Planner Welsh Government

Annex 1 - Statement of General Conformity
The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).
There is a joint position statement on the relationship between Bridgend, Cardiff and the Vale of Glamorgan (BP20A), which considers population growth, migration patterns, housing completions, employment characteristics, demographics, commuting and transport links between the three adjoining authorities. The Welsh Government supports the principle of this work which demonstrates how change in the Vale of Glamorgan relates and complements growth in adjoining local authorities. This approach illustrates a good mechanism for other local authorities to follow.
Reasons

Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the climate change and biodiversity emergencies, making the best use of resources.
Policy 1 and Policy 33 of Future Wales states that Cardiff, Newport, and the Valleys will be the main focus for growth and investment in the region. The strategic diagram (p163) also identifies the Vale of Glamorgan within the National Growth Area. The Vale of Glamorgan RLDP, specifically BP20A, provides robust evidence on the interrelationship and key issues with adjoining authorities, including their interaction and how they have shaped and influenced the scale/location of growth in the RLDP. This is set out in the three Joint Position Statements (JPSs).
BP45 'Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR), May 2024, provides further evidence on how the scale of growth indicated for the region has shaped the scale of future economic growth within the Vale of Glamorgan. This results in a higher level of employment growth in the Vale of Glamorgan primarily to increase self-containment and reduce out-flows to adjoining urban areas. Two key areas for future economic growth are identified at Cardiff Airport/Bro Tathan Enterprise Zone and Aberthaw Power Station.
The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.
On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):
Policy 1: Where will Wales grow
Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 6: Town Centre First
Policy 10: International Connectivity – Cardiff Airport
Policy 12 Regional Connectivity
Policy 33: National Growth Area – Cardiff, Newport and the Valleys
Policy 36: South-East Metro
Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.
With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.
The Level of Growth - Homes and Jobs
The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).
Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to

represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns and fewer jobs proposed.
BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.
Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.
The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level of growth proposed in the plan.
We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.
The Welsh Government notes that BP0A identifies small and large windfalls, based on historic trends of 53/yr and 80/yr respectively. Also, the large windfalls are not included in the first two years of the trajectory, as per the DPM. A non-delivery allowance of 5% is identified, which reflects local characteristics in the Vale of Glamorgan. A flexibility allowance of 9.8% has been factored into the provision. The Welsh Government supports this approach, although whilst Appendix 1 contains a housing trajectory, there is no table to mirror that of Table 21, DPM. This should be included in Appendix 1. 6

Jobs: The Council's 10-year dwelling-led growth option results in a requirement for 4,875 new jobs (325 p/a) over the plan period. This broadly aligns with the projected growth for 5,338 (355 p/a) new jobs in the Employment Land Review (BP12) and as set out in Policy SP14.
The level of employment growth proposed (5,338 jobs) over the plan period is below the target in the currently adopted plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.
In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of homes and jobs proposed in the plan, which is in general conformity with Future Wales.
Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.

The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.
Paragraph 6.137 of the plan states:
"Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary."
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?
Affordable Housing Exceptions Sites
Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.
Employment Land
The Council's Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).
Delivery and Implementation
PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.
The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.
The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have 'rolled over' from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.
The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters.
It will be for the Council to justify deliverability supported by robust financial viability.
Gypsy and Travellers
The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are 'immediate' by 2026. WG note that 4 pitches have since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

Policy SP9 identifies a site at Llangan (0.76Ha) to accommodate the 7 pitches needed. It will be for the Council to demonstrate the appropriate site selection assessment process has been followed and that the site complies with requirements in PPW (4.2.35), Circular 005/2018 (paragraph 35) any relevant guidance and the DPM (5.80-5.85) to allocate a deliverable site in the plan period. The views of the relevant statutory bodies must also be agreed with no outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.
Renewable Energy
Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Could the Council provide an update on alternative options for a DHN in Barry?

It is welcome that the Renewable Energy Assessment (REA) has considered BMV policy, specifically for solar PV, and use of the Predictive ALC Map. The assessment has only considered non-BMV land (Subgrade 3b, Grade 4 and 5). The assessment would benefit from referencing the clarification provided in the DCPO letter of 1st March 2022 in respect of solar PV and BMV agricultural land for completeness.
The study identifies that in the Vale of Glamorgan solar development is more suitable than wind energy because of the flight path of aircraft in the south of the County Borough. However, there are some opportunities for wind sites, but these are likely to be small (<10MW) where aviation risks are lower and there is some grid access. Conversely, there are large expanses of land suitable for solar areas (>10MW) to the West of the County Borough, where there is little existing development. The study identifies 20 large-scale solar areas but recognises that grid constraints may impact the ability of sites to come forward.
Solar and wind search areas (where appropriate) below the 10MW Developments of National Significance (DNS) have been identified (Policy CC3). The plan also includes a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW (Policy CC4). Policy CC3 makes reference to adhering to the criteria in Policy CC4. However, would it not be the case that if search areas have been identified in Policy CC3 have they not already met the criteria? If they would not, should they be identified in the first place? Clarity would be beneficial. The Welsh Government supports the approach but seeks clarity on the point raised.
The Welsh Government notes the proposed search areas for wind energy near Morfa Ystrad Owen/Nant Rhydhalog, according to the Peatlands of Wales Evidence Score Map, the search area includes areas of peatland (Evidence Score 4). The site is also a SINC. This raises concerns as to how the inclusion of this search areas meets the policy test in PPW 6.4.15, 1a and 1b (Stepwise) regarding avoidance of irreplaceable peatland habitats and PPW 6.4.34.
Policy CC4 refers to Developments of National Significance (DNS) in 6.344 and 6.346. This should now refer to Strategic Infrastructure Projects (SIP) which replaced DNS.
Minerals
The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in the Vale of Glamorgan. The Welsh Government policy clarification letter (dated 11 November 2021) identifies a surplus of 1.68mt of crushed rock. As there is a surplus of crushed rock reserves and a lack of sand and gravel production in the Vale, no specific allocations are required in the replacement plan. It is unclear whether a Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region been agreed, or does the latest Position Statement (July 2022) explain how any shortfall will be met across 9

the region, particularly for crushed rock, of which the Vale has a surplus? Clarification would be beneficial.
BMV Agricultural Land
The Welsh Government has engaged with the Council for land quality advice, survey advice and ALC survey validation for candidate sites. The LPA has produced a specific topic paper on BMV policy application. BP23A. The Deposit RLDP allocates 188 hectares of housing land, 5.62 ha is identified as BMV land (under 3% of total housing allocations). The RLDP:
• Has sought to avoid BMV land wherever possible;
• Uses the Predictive ALC Map as a core evidence layer to inform: The spatial strategy;
• Settlement hierarchy decisions; and
• Candidate site assessments.
•
• Directs strategic growth to areas with least BMV land
• Removes or avoids allocations where BMV impacts were significant or unjustified.
• Quantifies total BMV loss and demonstrates it is minimal (5.62ha) and proportionate at plan level.
• Applies a sequential approach through: Preference for brownfield and non-BMV sites;
• Replacement of higher-BMV sites with lower-grade alternatives where possible.
•
• Requires site-specific ALC surveys to verify actual land quality before allocation.
• Demonstrates that allocated BMV land is: Often small, fragmented, or constrained;
• Sometimes previously disturbed or incapable of being farmed differently from surrounding lower-grade land; and
• Necessary to deliver the Plan's housing strategy where reasonable alternatives are unavailable.
•

In conclusion, the Welsh Government consider the Authority has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy, and on that basis no objection is offered.
Green Infrastructure
Policy SP19 should explicitly reference the need for development to be accompanied by a Green Infrastructure Statement.
PPW12 requires decision makers to apply the step wise approach to GI, with enhancement secured at every stage where possible, there is no distinction made between the quality of the GI assets – the qualification in the policy statement that states proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure should be redrafted to remove the quality reference. The need to avoid an impact in the first instance should also be explicitly incorporated into the policy.
Criterion 1 (Policy SP20) should be redrafted – the stepwise approach in PPW 12 6.4.15 1a - does not distinguish between relative ecological value – the avoidance step applies to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.
Welsh Language
There is limited reference to the Welsh language in the plan, either potential adverse impacts arising through

development, or mechanisms via a policy framework to support and grow the use of the language. There are references to a number of Welsh-medium schools (3.26) and the increase in the number of people able to speak Welsh according to the 2011 census (3.52) but there is no mention of the authority's Welsh Language Strategy or promoting or cross-referencing to the aims of 10

Cymraeg 2050: A million Welsh-speakers. Paragraph 6.81 of the plan refers to development north west of Barry:
"Land at North West Barry is allocated for a residential development of up to 376 dwellings and public open space. The site is in a sustainable location on the edge of the Barry, a key settlement, in a location that is well served by services and facilities, including a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium and Church in Wales) and two high schools (English and Welsh Medium) all located in reasonable walking distance. There is an active travel route along Port Road West, bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry. Barry station is 1.3 miles from the site entrance."
There is no mention that the Council want to undertake a Welsh Language Impact Assessment (WLIA) so there appears no attempt to measure the impact on the Welsh schools resulting from housing development? Could the Council clarify if such implications have already been covered in the WLIA for the plan, ISA, or are any specific policies necessary?

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/syf

5401 Object

Document Element: SP19 - GREEN INFRASTRUCTURE

Respondent: Emma Reed [2653]

Summary:

This Policy is laudable but it must be backed by proper flooding assessments of all areas before they are any more developments which could impact on existing dwellings.

Full text:

This Policy is laudable but it must be backed by proper flooding assessments of all areas before they are any more developments which could impact on existing dwellings.

Change suggested by respondent:

A need to ensure that when green infrastructure is agreed that that betterment to surrounding areas is achieved.

Sound: No

Attachments: None

5718 Object

Document Element: SP19 - GREEN INFRASTRUCTURE

Respondent: Mr David Entwistle [3264]

Summary:

This policy needs to be stronger and in more depth. The policy is too weak and does not go far enough into addressing the loss of biodiversity and natural habitats in the vale.

Full text:

This policy needs to be stronger and in more depth. The policy is too weak and does not go far enough into addressing the loss of biodiversity and natural habitats in the vale.

Change suggested by respondent:

Some figures should be put to this policy with a concrete promise by the council to increase habitat for certain key species and environments by a specific amount. All building should align with nature standards full stop, not where possible, as this is too weak and gives developers too much room to circumnavigate meeting their moral responsibilities in favour of increased profits.

Sound: No

Attachments: None

6165 Comment

Document Element: SP19 - GREEN INFRASTRUCTURE

Respondent: Ms Lucie Taylor [2506]

Summary:

SF&G [Social Farms & Gardens] suggests encouragement for community food growing uses such as community gardens, orchards, informal incredible edible style spaces and community allotments. there are many types of community food growing that can contribute positively to green infrastructure and its network improvements.
These are nature based solutions that gain community 'buy in' and the potential for further improvements from the ground up.

Full text:

SF&G suggests encouragement for community food growing uses such as community gardens, orchards, informal incredible edible style spaces and community allotments. there are many types of community food growing that can contribute positively to green infrastructure and its network improvements.
These are nature based solutions that gain community 'buy in' and the potential for further improvements from the ground up.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6732 Comment

Document Element: SP19 - GREEN INFRASTRUCTURE

Respondent: Cardiff and Vale University Health Board (Claire Beynon, Executive Director of Public Health) [2397]

Summary:

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or
urban agriculture as part of the multifunctional green infrastructure.

Full text:

The overall contribution to health and wellbeing of the Deposit RLDP is positive and there are opportunities to develop further detail through the supplementary planning
guidance (SPG) proposed. We are keen to ensure that these SPG's are progressed within the short-term and that Cardiff and Vale University Health Board (CAVUHB) are
involved in the development of some of these. The content and application of the SPG's will be fundamental to the effectiveness of several of the policies identified in the
deposit plan. These must be supported by effective processes and relationships that ensure the intentions for positive contributions to health and wellbeing are delivered.

The Deposit RLDP provides a strong framework for placemaking, climate action, and healthy communities. Opportunities exist to further embed healthy and sustainable food systems as essential spatial infrastructure rather than solely as community
amenity or retail management issues. Strengthening policy wording in areas such as placemaking, rural diversification, employment land, green infrastructure, and community infrastructure would better align the Deposit Plan with the Well-being of Future Generations Act, Planning Policy Wales Placemaking agenda, and emerging Welsh food system strategies. This is particularly relevant as the Future Generations Commissioner named his first priority area in office being food, and the Welsh Government has recently published its Community Food Strategy. The Future Generations Office also recently produced guidance for local authorities including several planning-related recommendations.

The following comments are provided in the order they appear in the document:

Spatial strategy: SP1 - Sustainable growth: While the plan addresses overall growth distribution, it does not consider how development affects local food resilience, including the protection of agricultural land, peri-urban growing spaces, or local supply chains. There is no strategic reference to food as a component of sustainable, resilient communities. The vision and strategic objectives currently contain no mention of 'food' or 'farming'.

Request to add reference (Spatial strategy or Strategic objectives section) to supporting resilient and sustainable local food systems in spatial strategy principles, including protection of productive land and support for local supply chains. Suggested wording includes: "The Local Development Plan will support resilient and sustainable
local food systems by safeguarding productive agricultural land, promoting peri-urban food growing opportunities, and facilitating local food supply chains as an integral part
of sustainable growth."

SP4 Placemaking: Placemaking principles are clear and it is encouraging that prioritising the determinants of health and wellbeing during the design process are included as one of the principles. The placemaking statement forming part of the Design and Access statement is welcome to ensure any proposal aligns with the principles. The placemaking SPG will be key to consolidate guidance on physical activity, transport, climate resilience, mental wellbeing, access to food and food production, and inclusive design. Whilst this section focuses on design quality, density, and public spaces it does not explicitly incorporate food production or edible landscaping. Opportunities for multifunctional green spaces that produce food are missed, which could support local
diets, biodiversity, and community engagement. Suggestion to include wording to support multi-functional green infrastructure consistent with placemaking principles:

“Development proposals, where appropriate, should incorporate productive landscapes, edible landscaping, rooftop or community growing spaces, and other
opportunities for local food production as part of multifunctional green infrastructure.”

SP5 Creating Healthy and Inclusive Places and Spaces: CAVUHB support the statement that 'Developers are required to undertake a screening assessment of their
proposal at the pre-application stage to identify the potential health impacts of their development'. CAVUHB agrees with the criteria set out in the table and would like to see examples/further guidance of 'other' developments where there is likely to be a significant impact on health and wellbeing. HIA should also consider the cumulative
impact across multiple smaller developments in the same area, and whether they trigger thresholds collectively.

6.54 We suggest adding the word 'abilities' to the sentence '...enabling people of all ages, backgrounds and abilities to live in an environment that will support them to live
full, productive and prosperous lives.'

6.60 We welcome the requirement for new developments to conduct screening at the pre-application stage using the Council's Health and Wellbeing checklist and the rapid
HIA. We are keen that CAVUHB are involved in the development of the Healthy Placemaking SPG to consider how submitted HIAs will be assessed by the Council to
ensure Developers submit a quality HIA and implement the conclusions.

6.61 Amendment to organisation titles to: Cardiff and Vale University Health Board and Wales Health Impact Assessment Support Unit (Public Health Wales).

6.62 Wales Health Impact Assessment Support Unit has recently released guidance on HIA - see https://phwwhocc.co.uk/whiasu/ for more information and toolkits to ensure most up to date is in use.

6.63 Suggestion to amend the paragraph to include reference to 'access' to services, for example 'A further role of the RLDP is to support the access to and delivery of community, health and social care and wellbeing services within the community..'.

6.65 Suggestion to change wording from 'encouraged' to 'expected' for example:
Developers are expected to engage with the Health Board at pre-application stage to enable due consideration of healthcare infrastructure requirements.' The requirement
for HIA will assist with this expectation.

Key housing sites (HG1 KS1 onwards): The Key Site requirements reference “enhancements to leisure, sport and recreation spaces”. Without quantified standards or phasing triggers, however, these requirements may be difficult to enforce consistently at the planning application stage. Clear policy hooks or supporting standards prior to submission would strengthen implementation. It is recommended that the Key Site schedules include minimum on-site provision standards and delivery
phasing obligations to ensure that both sport infrastructure and recreational space provision keep pace with the additional demand generated by future population
growth.

SP11 Retail, commercial and service centre hierarchy and RCS1 Resilient retail, commercial and service centres: This policy focuses on hierarchy and vitality of retail
centres but fails to actively support the resilience of local retail, through measures which support local food markets, small-scale fresh food retailers, or local producer
supply chains. This limits opportunities for strengthening local food economies.
It is important that the need for convenience food retail space within Barry, Penarth and Llantwit Major, recognised in SP11, is matched with this rational for ‘local affordable food’ outlined in SP5.

Consider adding: “The Council will support local food markets, cooperative food retail, and initiatives that strengthen local producer supply chains within town and service centres, in line with the Town Centres First approach.”

RCS3 - hot food takeaways: CAVUHB commends the recognition that the clustering of unhealthy food outlets is a significant health issue and supports the proposals to

consider controls on takeaway proliferation (RCS3). This will support the creation of healthy environments, a commitment within the Cardiff and Vale Good Food and
Movement Framework endorsed by RPB. Health and inclusion policies mention general wellbeing but do not specifically address access to healthy food, food deserts, or distribution of retail providing fresh/local food, especially in new or expanding residential areas.

Proposal to include criteria for equitable access to healthy food and community food infrastructure in development proposals, such as: “Major developments should demonstrate equitable access to healthy food outlets, community growing facilities, or other community food
infrastructure within walking distance of new residential areas.” This addresses diet related health inequalities, encourages healthier communities and aligns with HIA
guidance.

EMP6 Rural diversification: The plan frames food production predominantly as a community activity rather than recognising its commercial, economic, and supply
chain potential. This limits opportunities for climate-resilient rural economies in a county with such a rural character as the Vale. Policy supports general rural business diversification but does not explicitly enable
agro-ecological practices, local food processing, CSA (community-supported agriculture), or other sustainable farming models.

Proposal that the plan should explicitly support sustainable, commercially viable local food enterprises as legitimate rural employment uses - to include the following wording: “Rural diversification proposals that support agro-ecological farming, sustainable local food production,
community-supported agriculture, and short supply chain enterprises will be supported where compatible with landscape and environmental considerations.”

SP10 Sustainable transport: We support these policies, and suggest the plan is explicit that all new active travel infrastructure should meet the statutory Active Travel
Act guidance (Link: ttps://www.gov.wales/sites/default/files/publications/2022
01/active-travel-act-guidance.pdf) and also that infrastructure should be built to a specification to ensure resilience as extreme weather events increase, preventing
flooding and making use more comfortable during hot weather (such as shading from trees). We note the absence of reference to people living with disabilities and suggest adding 'wheeling' as well as walking and cycling.

SP13 Community infrastructure and planning obligations:

We want to take this opportunity to highlight the challenges that population growth places on healthcare
services. The projected level of population growth identified within the RLDP will have an impact on the CAVUHB's community healthcare facilities and infrastructure. Please refer to the information provided as part of the background evidence paper titled 'BP37
Primary, Community and Intermediate Health Care 'for more detail on the CAVUHB response which identifies there is limited scope for the current infrastructure within
existing GP premises to absorb the LDP growth. CAVUHB recognises the need to prioritise the expansion of the existing estate (where feasible) or support new
developments to take forward its strategic objectives.

Open space and recreation (CI1 and CI2): The evidence base supporting the sport and recreation elements of Policies CI1 and CI2 could be strengthened. At present
there does not appear to be a full Open Space Assessment setting locally-derived standards, nor a Playing Pitch Strategy nor Indoor Sport Facility Assessment. The Cardiff and Vale of Glamorgan Sports and Physical Activity Facilities audit report is
currently underway (with completion anticipated in May 2026), which should make a useful contribution to the evidence base once available.

Community Facilities: this policy focusses on schools, healthcare and social infrastructure, but does not include food-related community facilities such as kitchens, food hubs or education centres. Proposal to include the following information: “Community facilities should include, where appropriate, community kitchens, food hubs, educational facilities for food skills, and other infrastructure that enhances local food resilience and social cohesion.”
There is no reference to the expectation that local communities are consulted in relation to the development of community facilities. We would like to see a
requirement for community engagement and that such developments are based on a detailed understanding of existing community strengths, assets, needs and
challenges. This might be achieved as part of the HIA which includes stakeholder engagement.

SP14 Employment Growth: Employment land allocations focus on general industrial and office uses, with no explicit support for food hubs, processing, or logistics facilities
that would enable local food supply chains. Again, in an agricultural county such as the Vale, and given Wales’ push for local supply resilience, this is a major opportunity gap. Consider including the following wording:

"Employment land allocations should consider the needs of food processing, distribution, and logistics facilities that support local and regional food supply chains." This supports local supply chain development, reduces food miles and provides local employment opportunities, Welsh Government evidence highlights the importance of food processing in local supply resilience.

SP19 Green infrastructure: this policy emphasises the biodiversity, climate adaptation and recreation, but does not explicitly recognise productive landscapes or
urban agriculture as part of the multifunctional green infrastructure.

Suggested wording: "Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing."

SP16 Climate change: this policy addresses migration and adaptation but omits food systems. It also does not recognise the emissions reductions from local food
production, short supply chains or sustainable farming practices.
Consider including the following wording: "Development proposals should encourage short supply chains, low-carbon farming methods, and local food production where feasible, in order to support climate change mitigation and adaptation objectives."

Change suggested by respondent:

Suggested wording: "Green infrastructure networks should recognise and integrate food productive landscapes, urban agriculture, and community growing spaces as multifunctional components contributing to biodiversity, climate adaptation, and wellbeing."

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3h6
6714-6733 Submission Cardiff and Vale LHB Redacted - https://valeofglamorgan.oc2.uk/a/4tf

6789 Support

Document Element: SP19 - GREEN INFRASTRUCTURE
Respondent: Persimmon Homes (East Wales) [1068]
Agent: Boyer Planning

Summary:

In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels

of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

Housing Market and Housing Need

In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.

Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.

Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.

Section 4: Key Themes, Vision & Objectives

Key Themes

Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.

In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.

Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.

Vision

In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.

The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.

In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.

Strategic Objectives

Objective 3 – Home for All

Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.

Objective 4 – Placemaking

As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.

Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.

Objective 8 – Promoting Active and Sustainable Travel Choices

Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.

Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.

Section 5: Sustainable Growth Strategy

RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.
Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis

that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.
In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.

This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.

For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.

In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).

In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.

Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National

Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement
From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.
In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.
Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.
Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.
Policy SSC1 – Development within Settlement Boundaries
Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.

Policy SP4 – Placemaking
In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.
In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car.
Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.
The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.
Policy PGD1 – Creating Well Designed and Inclusive Places
Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.
On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy

remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:

Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
Loss of Allocated Employment Land
Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
Policy HG3 – Housing Led Redevelopment Opportunity
Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School,

including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
Policy SP7 – Affordable Housing Provision
In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
Policy SP8 – Affordable Housing Requirements
Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.
Policy SP10 – Sustainable Transport
Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.
In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
Policy TR1 – Transport Proposals

Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.

In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.

Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.

Policy SP13 – Community Infrastructure and Planning Obligations

Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.

Policy CI1 – Open Space Provision

Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.

The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.

Productive and Enterprising Places

Policy CC1 – Residential Operational Net Zero Carbon Development

Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.

Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.

Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.

The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.

Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.

Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the

council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.

Distinctive and Natural Places

Policy SP19 – Green Infrastructure

In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.

For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.

The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.

Policy SP20 – Biodiversity and Ecosystem Resilience

In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Policy DNP1 – Special Landscape Areas

Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.

Policy DNP2 – Green Wedges

Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.

Policy DNP8 – Severn Estuary Recreational Pressure

Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.

The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.

From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.

Conclusion

Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes' most pertinent comments on the consultation document are summarised below:

• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and

other modes of public transport.
• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/38r

6922 Support

Document Element: SP19 - GREEN INFRASTRUCTURE

Respondent: Barratt Redrow Homes [2669]

Agent: Boyer Planning

Summary:

In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.

Full text:

1. INTRODUCTION
1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.
1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:
• Section 3 – The Vale of Glamorgan Key Characteristics;
• Section 4 – RLDP Key Themes, Vision, and Objectives;
• Section 5 – Sustainable Growth Strategy; and
• Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.

1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS
Settlement Pattern
2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.
2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Need
2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
3. RLDP KEY THEMES, VISION, AND OBJECTIVES
3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.
Key Themes
3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY
Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary

settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy

SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.

5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.

5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.

5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.

5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

5.10 For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

5.11 More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

5.12 Whilst Barratt Redrow appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range, having reviewed the Deposit Plan evidence base Barratt Redrow believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.

5.13 In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

5.14 Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).

5.15 In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

5.16 In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need. Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036) and therefore is made up of

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.
5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.
5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.
5.27 In summary, Barratt Redrow acknowledge the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
5.28 These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance and additional site allocations, such as Swn Y Coed, Wenvoe, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
5.29 Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.
5.30 Accordingly, despite Wenvoe being identified as a primary settlement, Policy SP2 notes that development in this

location will be limited to 'the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.' Similarly, it is noted that Policy SP2 does not consider Wenvoe to be an appropriate location for ''substantial additional growth''.
5.31 Barratt Redrow object to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified.
5.32 First of all, the Deposit Plan acknowledges that it performs a similar function to the Primary Settlements located within the Strategic Growth Area and it is described as one of the 'sustainable communities' in The Vale of Glamorgan Key Characteristics section, as noted previously in Section 3.
5.33 Likewise, the site benefits from excellent accessibility the local public transport network, active travel routes and local services. These characteristics fully accord with Welsh Government's strategic objectives and emphasise the fact that Swn Y Coed constitutes an appropriate location for future housing.
5.34 With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge''. Barratt Redrow do not consider this to be sufficient justification to discount the site from allocation as there would be limited impact on BMW agricultural land arising from the development of Swn Y Coed.

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available.
5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.
Policy SP4 - Placemaking
5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.
5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.
5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.
5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.
5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
Policy PGD1 – Creating Well Designed and Inclusive Places
5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate

understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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Unsustainable Location & Poor Connectivity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.

• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.
• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.
• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.
• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.
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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
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• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility

through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply
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• HG1 (8) St Athan - Clive Road, St Athan

Policy HG3 – Housing Led Redevelopment Opportunity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision

'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and

whether the plan is justified (Test 3).
• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4).Finally, the Council's own Viability Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.
• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.
• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:
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Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:
i. Space heating demand less than or equal to 40kWh/m2/year;
ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.
• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's

methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
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Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established 'defensible' limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a

similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be 'largely shielded from view by woodland blocks/strips'.
• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for 'infilling' the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.
• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
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Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
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Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.

• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
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MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
•
• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
•
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
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CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the Council's vision for the VoG.
• 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
• 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
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6. CONCLUSION

• Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.
• Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swn Y Coed, are necessary to ensure the RLDP is able to effectively meet
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Barratt Redrow welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Barratt Redrow support the requirements for affordable housing in new development. In its current form the proposed policies SP7 and SP8 lack sufficient flexibility for site specific circumstances and physical constraints which may impact upon delivery. This inevitably creates uncertainty for a number of sites, where the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities.
• From a planning perspective it is also important to recognise the additional benefits the site (Candidate Site Ref No. 437) could provide in accommodating the increased housing need generated by the suggested 15% flexibility allowance within a highly sustainable location. The principles of which clearly align with the Council's aspirations and would maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3ch

6970 Support

Document Element: SP19 - GREEN INFRASTRUCTURE

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)

Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
Our representations on the site allocations are included in appendix 2.
We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the ‘domestic’ supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.

We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.
Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site
Our representations on site allocations are provided in the table below. The following caveats are applicable to all sites:
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion.
• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
The following provisions are applicable to all allocated employment sites:
• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
• Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary

reinforcements.
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

7031 Object

Document Element: SP19 - GREEN INFRASTRUCTURE

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment (and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site

allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of “areas of high ecological value” will also go some way towards resolving the points we raise.
Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.
Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.
This will ensure that development in the area:
• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of ‘High Ecological Value’ (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should

also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure
Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological
connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to ‘6 broad habitat types’ including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to ‘6 broad ecosystems’ to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP’s Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity

A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development

would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it "is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary".
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW's Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational
Pressure' within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs
clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)

We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

7200 Support

Document Element: SP19 - GREEN INFRASTRUCTURE
Respondent: H Jones, L Sungur and P John [3741]
Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

Provision of Green Infrastructure in residential, and all developments is supported.

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis. Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

The inclusion of the site within the settlement boundary is logical especially when viewed in the context of the linear settlement of Fferm Goch. In addition the site is further suited to development allocation as the northern and southern boundaries are built up and the main road runs along the eastern boundary. A flexible approach is encouraged with regard to the delivery of the dwellings in relation to a variety of factors and policy provisions including the housing needs across the Vale, the limit on numbers of rural affordable led sites in minor rural settlements, viability implications relating to obligations/carbon Zero and sustainability obligations and the potential to extend the allocation if the need for homes requires.

The 3 land owners remain committed to this development and local developers are waiting to deliver the allocation.

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

The test of soundness for a Local Development Plan (LDP) is a critical component of the planning process to ensure that the plan is prepared in accordance with legal and procedural
requirements. It involves demonstrating that the plan is 'sound' based on three tests set out by the Welsh Government in the Development Plans Manual (Edition 3). These tests have therefore been considered in our representation, the tests include:

• Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)
• Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
• Test 3: Will the plan deliver (i.e. is it likely to be effective?)

SP1 – Sustainable Growth Strategy

The promotion of small scale affordable housing led development outside of the SGA, as proposed by SP1 is important as this provides essential affordable and market homes in the rural locations of the Vale as well as the SGA. Their provision is critical in meeting the area's housing needs, particularly affordable dwellings and supporting rural community stability, and ensuring that all parts of the Vale remain a place where people of all incomes are able to live and thrive during the plan period to 2036 and beyond.

The essence of Policy SP1 is supported, however it is well documented that there is a backlog in delivery of affordable homes and the need for affordable housing in the Vale is exacerbated by the high prevalence of single person households plus households comprising couples with no children, The Vale also has one of the highest affordability pressures in Wales. As stated in the 2023 Local Housing Market Assessment (LHMA) for the Vale of Glamorgan , the median house price in the Vale is around 8 times the median household income, well above the affordability threshold of 4.5 to 5 times household income for borrowing purposes. Private rents have also risen sharply in the area, commonly placing them out of reach for many low-to-middle income households. All of the above place further pressure on the need to deliver affordable homes in the locality.

The LHMA identifies a need for 1,075 affordable homes per year over the next 5 years based on principal projections (or 1,114 based on the RLDP projections). As mentioned previously past delivery rates fall significantly short and therefore a backlog is present, however despite the reported backlog the RLDP only proposes 3,070 (205/annum) affordable dwellings over the plan period to 2036. Despite the growth strategy of policy SP1 and allocations made through the RLDP, the figure of proposed affordable dwelling numbers is concerning as it falls significantly short of the demand evidenced within the most recent evidence of LHMA of 2023.

The housing figures quoted in SP1 indicate 7,890 dwellings (including the 3,070 affordable dwellings) to 2036, however these figures overall are inadequate over the plan period when considered against the 2022 WG household projections. The 2022-based household projections provide an indication of the future number of households, and their composition, based on population projections and assumptions about households from recent censuses. The vale of Glamorgan demonstrates an increase of almost 12% in the number of households between mid-2022 and mid-2032; note this is the highest percentage increase by Local authority in Wales and way above the average for Wales as a whole (that stands at around 7% increase). The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both open market, but particularly Affordable) development across the Vale.

Without targeted allocations outside of the SGA, as outlined in Policy SP1, the gap described above will continue to widen, forcing more residents to leave the area and weakening community cohesion.

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the RLDP the supporting text of Policy SP2 states:
'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

sustainable growth. Locating affordable-led developments in areas with existing infrastructure such as primary schools will reduce car dependency, lower carbon emissions, and contribute to the Council's climate change commitments.

Considering the above, the limit on small scale rural affordable housing led developments (RAHLD) to 25 for these settlements is questioned and further flexibility recommended on a case by case basis. It is understood the limit on numbers was imposed due to the existing scale of the settlement in which the RAHLD are located, however those allocations will only likely deliver at 50% affordable and therefore only provide 12.5 (or 13) affordable units as a maximum (note Fferm Goch would provide 11 affordable dwellings on current figures of 22 total dwellings). Given the concerns raised in response to Policy SP1 there remains an issue of whether the numbers proposed in the RLDP can meet the demonstrable need for affordable homes and if there is scope on a RAHLD to sensitively increase unit numbers without any material harm then the policy should be flexible to accommodate this.

Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the range of facilities and services provided in these settlements. It is also supported that these settlements are able to

provide affordable led residential development of up to 50 dwellings (delivering 25 affordable units). However the provision of an increased number of units in the Primary Non SGA settlements must not be at the expense of a wider number of smaller rural sites with the ability to sustain smaller communities across the Vale, especially given the shortfall in numbers as outlined above.

PGD2 – Residential Development Densities

The best use of finite land is set out in PPW and consistent with the setting of the densities as prescribed in policy PGD2. The policy is considered to meet the 3 tests of soundness.

The approach of policy PGD2 is also supported through the proposed density of the site North of Westwinds business park, Fferm Goch in HG4 (4). This allocation that proposes to provide a density of just over 30/ha within Fferm Goch, a minor rural settlement.

SP6 – Housing Requirement

Affordable housing forms an important part of the housing requirement figures of Policy SP6. Whilst the total 122 dwellings proposed under policy HG4 is a relatively small contribution to the overall figures it provides important spatial distribution of homes across the Vale within the rural area.

Given the concerns raised with regard to Policy SP1 there is fear that the affordable housing numbers will not be sufficient to meet need. The site north of Westwinds business park, Fferm Goch has the ability to expand to the south (as per the CS Ref 398) in order to accommodate additional dwellings (both market and affordable dwellings in order to sustain the viability of the site).

SP7 – Affordable Housing Provision

In accordance with Policy SP7 the allocated site HG4(4) at Fferm Goch provides a range of tenures, types and sizes in response to the LHMA, waiting list data and Older persons housing strategy in order to provide for 11 dwelling units and contributing toward the 3,070 affordable requirement to 2036. Changes in the household composition mean more single person and small homes are required, plus older person accommodation for those wishing to downsize and stay in the area.

Please see comments for Policy SP1 / Policy SP2 above regards concern over the proposed housing numbers and supply of affordable homes against demand - this therefore brings the Deliverability of the plan in to question (Test of Soundness 3).

SP8 – Affordable Housing Requirements

Policy SP8 is supported in so far as contributing much needed affordable housing development commensurate with the size of the settlement in which it sits. We are encourage to see reference to the provision of affordable housing to be negotiated on a site by site basis considering evidenced viability fo the development.

The affordable dwellings proposed foster stability in rural areas by allowing a range of households (from single person to growing families) to stay in their local area.

Policy SP8 states 40% affordable for those developments in primary and minor settlements outside of the SGA yet 50% requirement on affordable housing led allocations in minor rural settlements (also outside of the SGA). This appears inconsistent and penalising those smaller rural sites that will already be more delicately balanced in viability terms by virtue of their limited size of 25 units. Further viability issues covered in other policies (such as SP20, relating to biodiversity, Net Zero and sustainability credentials must (with the required evidence submitted and assessed by the council as stated in Policy SP8) be flexibly reviewed to ensure sites are viable and deliverable as recognised by the Council, there is a danger the stringent requirements, especially for smaller sites, could render those sites unviable in the current climate with rising build costs.

HG4 – Rural affordable housing led sites

The allocation of land north of West Winds Business Park under policy HG4(4) for rural affordable housing led development of 22 units is strongly supported. Then allocation will assist in delivering homes in the rural Vale and contribute to the important stability to the settlement of Fferm Goch to 2036.

The extension of the settlement limit including the site north of West Winds Business Park is supported. The site provides an obvious infill to the small break in the built up area to both the north and south of the site, with the main road running to the eastern boundary of the site.

The inclusion of the site within the settlement of Fferm Goch is logical and in harmony with the existing linear settlement.

The proposal supports the aims of the Local Development Plan and the Welsh Government's commitment to increasing affordable housing supply. By providing for affordable led allocations the policy aligns with the Well-being of Future Generations (Wales) Act 2015 in aiming to promote a healthier, more equal, and cohesive community.

There is concern however surrounding the number of dwellings proposed and if the Plan seeks sufficient dwellings and affordable provision given the predicted need to 2036 shown in the LMHA.

SP13 – Community infrastructure and planning obligations

Policy SP13 demonstrates the importance of community infrastructure in sustaining both the residents well being and economic growth of an area. See also the response to Policy SP2 that refers to the allocation of housing in the rural areas specifically supporting those settlements with local primary school provision.

The viability of developments however must not be compromised in order to ensure delivery of the plan. To see in Policy SP13 that 'development viability' is recognised as a key factor in delivering community infrastructure under planning obligations, is supported. It is recommended that this recognition is replicated in other policies of the LDP in order that the third Test of soundness can be fully met; Deliverability – ensuring the plan is likely to be effective). See comments in relation to Policies SP8/CC1/SP16/CI1.

CI1 – Open Space Provision

Provision of open space in residential developments is supported. HG4(4) promotes open space within the draft allocation.

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

The provisions of SP16 are generally supported as practical measures to ensure important sustainable development is achieved.

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

Provision of Green Infrastructure in residential, and all developments is supported.

HG4(4) retains and enhances existing and will promote green infrastructure on the draft allocation.

The viability of developments however must not be compromised through green infrastructure provision - in order to ensure delivery of the plan. The 'development viability' should therefore be recognised as a key factor in delivering Green Infrastructure. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

Fferm Goch is one of the settlements that remains fully within and covered by the Upper and Lower Thaw Valley Special Landscape Area (SLA). It is noted that in such settlements, while there have been amendments to the identified settlement boundary (inclusion of HG4 (4) rural affordable led housing allocation) this has not affected the SLA designation in these areas. (Background Paper 45; Paragraph 1.16 refers).

The location of the small allocated site HG4(4) is nestled within the settlement of Fferm Goch. It is built up on both the northern and southern boundaries, with the main road running along the eastern boundary. There is no unacceptable

harm to the SLA of the Upper and Lower Thaw valley.

The allocation of the site for residential development does not give rise to unacceptable harm to the special qualities and characteristics of the SLA, based on LANDMAP information, continues to be preserved.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

7201 Comment

Document Element: SP19 - GREEN INFRASTRUCTURE

Respondent: H Jones, L Sungur and P John [3741]

Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

The viability of developments however must not be compromised through green infrastructure provision - in order to ensure delivery of the plan. The 'development viability' should therefore be recognised as a key factor in delivering Green Infrastructure.

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis. Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

The inclusion of the site within the settlement boundary is logical especially when viewed in the context of the linear settlement of Fferm Goch. In addition the site is further suited to development allocation as the northern and southern boundaries are built up and the main road runs along the eastern boundary. A flexible approach is encouraged with regard to the delivery of the dwellings in relation to a variety of factors and policy provisions including the housing needs across the Vale, the limit on numbers of rural affordable led sites in minor rural settlements, viability implications relating to obligations/carbon Zero and sustainability obligations and the potential to extend the allocation if the need for homes requires.

The 3 land owners remain committed to this development and local developers are waiting to deliver the allocation.

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
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• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

The test of soundness for a Local Development Plan (LDP) is a critical component of the planning process to ensure that the plan is prepared in accordance with legal and procedural
requirements. It involves demonstrating that the plan is 'sound' based on three tests set out by the Welsh Government in the Development Plans Manual (Edition 3). These tests have therefore been considered in our representation, the tests include:

• Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)
• Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
• Test 3: Will the plan deliver (i.e. is it likely to be effective?)

SP1 – Sustainable Growth Strategy

The promotion of small scale affordable housing led development outside of the SGA, as proposed by SP1 is important as this provides essential affordable and market homes in the rural locations of the Vale as well as the SGA. Their provision is critical in meeting the area's housing needs, particularly affordable dwellings and supporting rural

community stability, and ensuring that all parts of the Vale remain a place where people of all incomes are able to live and thrive during the plan period to 2036 and beyond.

The essence of Policy SP1 is supported, however it is well documented that there is a backlog in delivery of affordable homes and the need for affordable housing in the Vale is exacerbated by the high prevalence of single person households plus households comprising couples with no children, The Vale also has one of the highest affordability pressures in Wales. As stated in the 2023 Local Housing Market Assessment (LHMA) for the Vale of Glamorgan , the median house price in the Vale is around 8 times the median household income, well above the affordability threshold of 4.5 to 5 times household income for borrowing purposes. Private rents have also risen sharply in the area, commonly placing them out of reach for many low-to-middle income households. All of the above place further pressure on the need to deliver affordable homes in the locality.

The LHMA identifies a need for 1,075 affordable homes per year over the next 5 years based on principal projections (or 1,114 based on the RLDP projections). As mentioned previously past delivery rates fall significantly short and therefore a backlog is present, however despite the reported backlog the RLDP only proposes 3,070 (205/annum) affordable dwellings over the plan period to 2036. Despite the growth strategy of policy SP1 and allocations made through the RLDP, the figure of proposed affordable dwelling numbers is concerning as it falls significantly short of the demand evidenced within the most recent evidence of LHMA of 2023.

The housing figures quoted in SP1 indicate 7,890 dwellings (including the 3,070 affordable dwellings) to 2036, however these figures overall are inadequate over the plan period when considered against the 2022 WG household projections. The 2022-based household projections provide an indication of the future number of households, and their composition, based on population projections and assumptions about households from recent censuses. The vale of Glamorgan demonstrates an increase of almost 12% in the number of households between mid-2022 and mid-2032; note this is the highest percentage increase by Local authority in Wales and way above the average for Wales as a whole (that stands at around 7% increase). The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both open market, but particularly Affordable) development across the Vale.

Without targeted allocations outside of the SGA, as outlined in Policy SP1, the gap described above will continue to widen, forcing more residents to leave the area and weakening community cohesion.

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as ‘Minor Rural Settlements’. Within the
RLDP the supporting text of Policy SP2 states:
‘several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate’.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale’s own strategic objectives for

sustainable growth. Locating affordable-led developments in areas with existing infrastructure such as primary schools will reduce car dependency, lower carbon emissions, and contribute to the Council’s climate change commitments.

Considering the above, the limit on small scale rural affordable housing led developments (RAHLD) to 25 for these settlements is questioned and further flexibility recommended on a case by case basis. It is understood the limit on numbers was imposed due to the existing scale of the settlement in which the RAHLD are located, however those allocations will only likely deliver at 50% affordable and therefore only provide 12.5 (or 13) affordable units as a maximum (note Fferm Goch would provide 11 affordable dwellings on current figures of 22 total dwellings). Given the concerns raised in response to Policy SP1 there remains an issue of whether the numbers proposed in the RLDP can meet the demonstrable need for affordable homes and if there is scope on a RAHLD to sensitively increase unit numbers without any material harm then the policy should be flexible to accommodate this.

Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the range of facilities and services provided in these settlements. It is also supported that these settlements are able to provide affordable led residential development of up to 50 dwellings (delivering 25 affordable units). However the provision of an increased number of units in the Primary Non SGA settlements must not be at the expense of a wider number of smaller rural sites with the ability to sustain smaller communities across the Vale, especially given the shortfall in numbers as outlined above.

PGD2 – Residential Development Densities

The best use of finite land is set out in PPW and consistent with the setting of the densities as prescribed in policy PGD2. The policy is considered to meet the 3 tests of soundness.

The approach of policy PGD2 is also supported through the proposed density of the site North of Westwinds business park, Fferm Goch in HG4 (4). This allocation that proposes to provide a density of just over 30/ha within Fferm Goch, a minor rural settlement.

SP6 – Housing Requirement

Affordable housing forms an important part of the housing requirement figures of Policy SP6. Whilst the total 122 dwellings proposed under policy HG4 is a relatively small contribution to the overall figures it provides important spatial distribution of homes across the Vale within the rural area.

Given the concerns raised with regard to Policy SP1 there is fear that the affordable housing numbers will not be sufficient to meet need. The site north of Westwinds business park, Fferm Goch has the ability to expand to the south (as per the CS Ref 398) in order to accommodate additional dwellings (both market and affordable dwellings in order to sustain the viability of the site).

SP7 – Affordable Housing Provision

In accordance with Policy SP7 the allocated site HG4(4) at Fferm Goch provides a range of tenures, types and sizes in response to the LHMA, waiting list data and Older persons housing strategy in order to provide for 11 dwelling units and contributing toward the 3,070 affordable requirement to 2036. Changes in the household composition mean more single person and small homes are required, plus older person accommodation for those wishing to downsize and stay in the area.

Please see comments for Policy SP1 / Policy SP2 above regards concern over the proposed housing numbers and supply of affordable homes against demand - this therefore brings the Deliverability of the plan in to question (Test of Soundness 3).

SP8 – Affordable Housing Requirements

Policy SP8 is supported in so far as contributing much needed affordable housing development commensurate with the size of the settlement in which it sits. We are encourage to see reference to the provision of affordable housing to be negotiated on a site by site basis considering evidenced viability fo the development.

The affordable dwellings proposed foster stability in rural areas by allowing a range of households (from single person to growing families) to stay in their local area.

Policy SP8 states 40% affordable for those developments in primary and minor settlements outside of the SGA yet 50% requirement on affordable housing led allocations in minor rural settlements (also outside of the SGA). This appears inconsistent and penalising those smaller rural sites that will already be more delicately balanced in viability terms by virtue of their limited size of 25 units. Further viability issues covered in other policies (such as SP20, relating to biodiversity, Net Zero and sustainability credentials must (with the required evidence submitted and assessed by the council as stated in Policy SP8) be flexibly reviewed to ensure sites are viable and deliverable as recognised by the Council, there is a danger the stringent requirements, especially for smaller sites, could render those sites unviable in the current climate with rising build costs.

HG4 – Rural affordable housing led sites

The allocation of land north of West Winds Business Park under policy HG4(4) for rural affordable housing led development of 22 units is strongly supported. Then allocation will assist in delivering homes in the rural Vale and contribute to the important stability to the settlement of Fferm Goch to 2036.

The extension of the settlement limit including the site north of West Winds Business Park is supported. The site provides an obvious infill to the small break in the built up area to both the north and south of the site, with the main road running to the eastern boundary of the site.

The inclusion of the site within the settlement of Fferm Goch is logical and in harmony with the existing linear settlement.

The proposal supports the aims of the Local Development Plan and the Welsh Government's commitment to increasing affordable housing supply. By providing for affordable led allocations the policy aligns with the Well-being of Future Generations (Wales) Act 2015 in aiming to promote a healthier, more equal, and cohesive community.

There is concern however surrounding the number of dwellings proposed and if the Plan seeks sufficient dwellings and

affordable provision given the predicted need to 2036 shown in the LMHA.

SP13 – Community infrastructure and planning obligations

Policy SP13 demonstrates the importance of community infrastructure in sustaining both the residents well being and economic growth of an area. See also the response to Policy SP2 that refers to the allocation of housing in the rural areas specifically supporting those settlements with local primary school provision.

The viability of developments however must not be compromised in order to ensure delivery of the plan. To see in Policy SP13 that 'development viability' is recognised as a key factor in delivering community infrastructure under planning obligations, is supported. It is recommended that this recognition is replicated in other policies of the LDP in order that the third Test of soundness can be fully met; Deliverability – ensuring the plan is likely to be effective). See comments in relation to Policies SP8/CC1/SP16/CI1.

CI1 – Open Space Provision

Provision of open space in residential developments is supported. HG4(4) promotes open space within the draft allocation.

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

The provisions of SP16 are generally supported as practical measures to ensure important sustainable development is achieved.

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

Provision of Green Infrastructure in residential, and all developments is supported.

HG4(4) retains and enhances existing and will promote green infrastructure on the draft allocation.

The viability of developments however must not be compromised through green infrastructure provision - in order to ensure delivery of the plan. The 'development viability' should therefore be recognised as a key factor in delivering Green Infrastructure. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

Fferm Goch is one of the settlements that remains fully within and covered by the Upper and Lower Thaw Valley Special Landscape Area (SLA). It is noted that in such settlements, while there have been amendments to the identified settlement boundary (inclusion of HG4 (4) rural affordable led housing allocation) this has not affected the SLA designation in these areas. (Background Paper 45; Paragraph 1.16 refers).

The location of the small allocated site HG4(4) is nestled within the settlement of Fferm Goch. It is built up on both the northern and southern boundaries, with the main road running along the eastern boundary. There is no unacceptable harm to the SLA of the Upper and Lower Thaw valley.

The allocation of the site for residential development does not give rise to unacceptable harm to the special qualities and characteristics of the SLA, based on LANDMAP information, continues to be preserved.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

5178 Object

Document Element: SP20 - BIODIVERSITY AND ECOSYSTEM RESILIENCE

Respondent: Welsh Government (Planning Division) (Mr Neil Hemington, Chief Planner) [2386]

Summary:

Criterion 1 (Policy SP20) should be redrafted – the stepwise approach in PPW 12 6.4.15 1a - does not distinguish between relative ecological value – the avoidance step applies to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.

Full text:

Thank you for consulting the Welsh Government on the Vale of Glamorgan Council Replacement Local Development Plan (LDP) – Deposit Plan. It is essential the authority is covered by an up-to-date LDP to give certainty to local communities and businesses and provide a robust basis for decision making.

Without prejudice to the Minster's powers, the Welsh Government is committed to assisting Local Planning Authorities (LPAs) minimise the risk of submitting unsound plans by making comments at the earliest stages of plan preparation. The Welsh Government looks for clear evidence that the plan is in general conformity with Future Wales: The National Development Framework, aligns with Planning Policy Wales (PPW) and the tests of soundness, as set out in the LDP Manual.

National planning policies are set out in Planning Policy Wales (PPW) Edition 12 and seek to deliver high quality, sustainable places through a place-making approach (the LDP should ensure it takes into account any further iterations of PPW prior to the examination). The implementation of the core policy areas in PPW, such as adopting a sustainable spatial strategy, appropriate housing and economic growth levels, infrastructure delivery and place-making, are articulated in more detail in the LDP Manual (Edition 3). We expect the core elements of the Manual, in particular Chapter 5 and the 'De-risking Checklist(s)' to be followed. Failure to comply with these key requirements may result in unnecessary delays later in the plan making process. The development planning system in Wales is evidence-led and demonstrating how a plan is shaped by the evidence is a key requirement of the LDP examination.

After considering the key issues and policies in Future Wales, the Welsh Government is of the opinion that the Replacement Deposit Plan is in general conformity with Future Wales: The National Development Framework. Specific comments are set out in the Statement of General Conformity (Annex 1 of this letter). Annex 2 highlights a range of issues that need to be addressed for the plan to align with PPW and the DPM. Collectively, our comments highlight a range of issues that need to be addressed for the plan to be considered 'sound' as follows:

Annex 1 – General Conformity with Future Wales

• No significant concerns

Annex 2 – Core matters that need to be/have been addressed (PPW and the DPM)

• Spatial Strategy and Primary Settlements
• Housing and Economic Growth Levels – Regional Collaboration
• Maximising Affordable Housing Provision
• Delivery & Implementation – General
• Gypsy and Travellers
• Renewable Energy
• Minerals
• Best and Most Versatile Agricultural Land (BMV)
• Welsh Language

I would urge you to seek your own legal advice to ensure you have met all the procedural requirements, including the Sustainability Appraisal (SA), Strategic Environmental Assessment (SEA) and Habitats Regulation Assessment (HRA), as responsibility for these matters' rests with your authority. A requirement to undertake a Health Impact Assessment (HIA) arising from the Public Health (Wales) Act 2017, if appropriate, should be carried out to assess the likely effect of the proposed development plan on health, mental well-being and inequality.

My colleagues and I look forward to meeting you and the team to discuss matters arising from this response.

Yours sincerely,

Neil Hemington

Chief Planner Welsh Government

Annex 1 - Statement of General Conformity

The Welsh Government is of the opinion that the Vale of Glamorgan Council Replacement Local Development Plan (2021-2036) Deposit Plan is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).

There is a joint position statement on the relationship between Bridgend, Cardiff and the Vale of Glamorgan (BP20A), which considers population growth, migration patterns, housing completions, employment characteristics, demographics, commuting and transport links between the three adjoining authorities. The Welsh Government supports the principle of this work which demonstrates how change in the Vale of Glamorgan relates and complements growth in adjoining local authorities. This approach illustrates a good mechanism for other local authorities to follow.

Reasons

Future Wales places emphasis on the development of National Growth Areas in a sustainable manner. Growth areas must be sustainably planned, reduce the need to travel by car, encourage walking and cycling (active travel), maximise public transport usage and incorporate green infrastructure. Growth areas must embed these principles within a wider regional consensus, focussing on the opportunities they bring to promote social and economic benefits across a broader

geographical area. The Welsh Government supports sustainable growth in National Growth Areas to respond to the climate change and biodiversity emergencies, making the best use of resources.
Policy 1 and Policy 33 of Future Wales states that Cardiff, Newport, and the Valleys will be the main focus for growth and investment in the region. The strategic diagram (p163) also identifies the Vale of Glamorgan within the National Growth Area. The Vale of Glamorgan RLDP, specifically BP20A, provides robust evidence on the interrelationship and key issues with adjoining authorities, including their interaction and how they have shaped and influenced the scale/location of growth in the RLDP. This is set out in the three Joint Position Statements (JPSs).
BP45 'Regional Assessment of Future Growth and Migration for the Cardiff Capital Region (CCR), May 2024, provides further evidence on how the scale of growth indicated for the region has shaped the scale of future economic growth within the Vale of Glamorgan. This results in a higher level of employment growth in the Vale of Glamorgan primarily to increase self-containment and reduce out-flows to adjoining urban areas. Two key areas for future economic growth are identified at Cardiff Airport/Bro Tathan Enterprise Zone and Aberthaw Power Station.
The result is a Sustainable Transport Orientated Growth spatial strategy focusing on the Cardiff – Bridgend railway line and A48 corridor, with the key settlement for growth at Barry, followed by service centres on public transport corridors.
On balance, the Welsh Government considers the Deposit Plan is in general conformity with key policies in Future Wales namely (not exhaustive):
Policy 1: Where will Wales grow
Policy 2: Shaping Urban Growth and Regeneration – Strategic Placemaking
Policy 6: Town Centre First
Policy 10: International Connectivity – Cardiff Airport
Policy 12 Regional Connectivity
Policy 33: National Growth Area – Cardiff, Newport and the Valleys
Policy 36: South-East Metro
Future Wales brings a new perspective that all LDPs have to embrace on how each LDP sits within the region as a whole and the relationship to other LDPs, in essence, a strategic approach to cross boundary relationships. There is evidence to support that approach in advance of an SDP. 4

Annex 2 – Core matters that need to be addressed (PPW and the DPM)
Spatial Strategy - Location of Growth
The Council tested 4 spatial options:
Option 1 – Continuation of the adopted LDP growth strategy
Option 2 – Dispersed Growth
Option 3 – Focused Growth
Option 4 – Sustainable Transport Orientated Growth
The Council has chosen Option 4: Sustainable Transport Orientated Growth for its Deposit Plan. The strategy seeks to locate most of the new growth in those settlements well served by existing/proposed rail infrastructure along the Vale of Glamorgan/Penarth branch lines. This will encourage and maximise the use of sustainable transport modes in the plans designated Strategic Growth Area (SGA). The SGA encompasses most of the Council's largest and more sustainable settlements and the Council considers that focussing development here will reduce the need to travel and will co-locate housing with employment opportunities, services, and community facilities.
With a significant proportion of the Council's brownfield land already developed/committed, there are limited opportunities for brownfield development moving forward. The existing land bank is stated as 5,140 dwellings (land supply 3,837 + windfall assumptions 1,303), to meet a proposed housing requirement 7,890 (provision 8,660). The authority has allocated 3,520 dwellings on new sites (Policy SP6, Table 2). As a result, the plan has adopted a predominantly greenfield strategy allocating the majority of new development on five key sites (Policy HG1, Sites KS1-5 totalling 2,278 dwellings) well-connected edge of settlement sites, close to existing or proposed rail stations. We note the Council has used TfW data in the site assessment process to assess sites and their proximity to transport nodes. The remaining sites are mainly 'rolled' forward from the adopted LDP. The Welsh Government supports the spatial strategy, which accords with Planning Policy Wales (PPW) and is in general conformity with Future Wales.
Spatial Strategy - Primary Settlements
The Council's settlement hierarchy allocates circa 92% of all housing development (committed and proposed) to settlements in the top three tiers of the hierarchy. The Welsh Government does not object to this approach. The recognition that Culverhouse Cross with few facilities on site and the presence of BMV Land, the expectation for limited growth (paragraph 6.14 & 6.15) is welcomed. Similarly, it is noted that Wick benefits from a primary school and has some scope for future growth, albeit in keeping with the scale and accessibility of the settlement. The Welsh Government is content that the scale of growth reflected in these two locations will reflect the availability of local facilities and services.
The Level of Growth - Homes and Jobs
The Deposit Plan (Policy SP1 & SP6) makes provision for 8,660 homes to deliver a housing requirement of 7,890 new homes (526 p/a) over the plan period 2021-2036, of which a minimum of 3,070 homes will be affordable. The flexibility allowance proposed by the Council is 9.8%. The delivery of new jobs is for 5,388 over the plan period (Policy SP14).
Homes: The 2018 WG Principal Projection results in a requirement of 431 units p/a, or 6,465 units over the plan period. The housing growth proposed in the plan (requirement) is around +1,425 units (22%) above the WG 2018 principal projection, the provision being +2,195 (34%) above. The Council consider the 10 year average housing completions to represent a more realistic level of growth to deliver the key issues the plan is seeking to address. The Council considers that a lower level of growth (2018 projection) is not appropriate because the projections do not take account of 5

any policy decisions and were prepared in advance of the Covid-19 pandemic with implications for migration patterns

and fewer jobs proposed.
BP8A (November 2025) considers the latest 2022 Welsh Government population and housing projections, noting they are higher than the 2018 based projections. The projections for the Vale of Glamorgan show significant variation in internal migration in particular which the Council considers should be treated with caution. The projections are trend based and are affected by specific factors that may have occurred within the previous 5 years. The 5 years in question included a period of high housebuilding associated with a newly adopted LDP, as well as the Covid 19 pandemic, where many students returned to home from term-time addresses and re-registered with GPs in the Vale.
Given the fluctuation in recent migration figures, the Council consider longer-term trends are more appropriate, and it is noted that the population change identified in the 10-year migration variant is of a similar level to that proposed under the RLDP projection. In conclusion, for the reasons identified above, despite the updated projections, the Council considers the RLDP housing requirement continues to represent a robust basis to deliver a sustainable and deliverable level of growth over the plan period. The Welsh Government does not object to the scale of housing contained within the plan.
The demographic evidence (February 2023, Edge Analytics) tested 12 growth scenarios comprising: demographic-led, dwelling-led, and employment-led scenarios. The preferred housing requirement is based on a 10-year dwelling-led scenario (526 dpa) that would result in a population growth of 9.7% over the plan period with an annual net in-migration of 1,009 persons. The Council considers this level of housing growth is deliverable with a large proportion met through existing commitments (51%) and a jobs total (4,875 jobs) that broadly aligns with the level of new jobs forecast in the Employment Land Study (5,338 jobs). Moreover, the scale of growth is considered by the Council to be compatible with Future Wales and the role the authority plays within the wider southeast region. With inward migration to the Vale of Glamorgan from Cardiff expected to slow as Cardiff's strategic sites deliver higher levels of housing and with employment opportunities in the Vale co-located with housing sites, there are further opportunities to reduce the high levels of out-commuting into Cardiff. Overall, this approach is proposed by the Council to deliver a level of growth that is balanced with the emerging Cardiff LDP and wider southeast region. The Welsh Government does not object to the level of growth proposed in the plan.
We note that historic completion rates in the Vale of Glamorgan have fluctuated considerably over recent years. The past 10-year (2011-2021) average completion rate is 526 dwellings p/a. This has been exceeded over the last 5-years (2016-2021) with 698 dwellings constructed p/a. Build rates in recent years are in part attributed to the delivery of the current adopted LDP strategy that has more of a 'rural settlement' focus, with multiple sites across many settlements being built out. Replicating this approach going forward (10,470 dwellings) would not comply with FW/PPW in terms of sustainable development and transport, potentially adversely impacting on Cardiff's growth strategy. On this basis, the Council considers that achieving 526 dwellings p/a in the preferred 10-year dwelling-led scenario is sustainable and deliverable and would provide a level of job growth (5,338 jobs) that is balanced with the housing requirement. The Welsh Government does not object to the level of housing proposed in the plan but demonstrating delivery of the key housing sites will be essential.
The Welsh Government notes that BP0A identifies small and large windfalls, based on historic trends of 53/yr and 80/yr respectively. Also, the large windfalls are not included in the first two years of the trajectory, as per the DPM. A non-delivery allowance of 5% is identified, which reflects local characteristics in the Vale of Glamorgan. A flexibility allowance of 9.8% has been factored into the provision. The Welsh Government supports this approach, although whilst Appendix 1 contains a housing trajectory, there is no table to mirror that of Table 21, DPM. This should be included in Appendix 1. 6

Jobs: The Council's 10-year dwelling-led growth option results in a requirement for 4,875 new jobs (325 p/a) over the plan period. This broadly aligns with the projected growth for 5,338 (355 p/a) new jobs in the Employment Land Review (BP12) and as set out in Policy SP14.
The level of employment growth proposed (5,338 jobs) over the plan period is below the target in the currently adopted plan (7,610-10,610 jobs). The lower target is considered by the Council to more accurately reflect the cohort of working aged people in the Vale of Glamorgan and would support a continuation of long-term housing delivery trends that takes into account lower housing growth post-recession and a shorter period of historically high dwelling completions (2016-2021). The Welsh Government does not object to the level of job growth proposed in the plan.
In summary, (and subject to the above clarification), the Welsh Government has no significant concerns with the level of homes and jobs proposed in the plan, which is in general conformity with Future Wales.
Affordable Housing Provision
The Local Housing Market Assessment 2023 (LHMA) (BP10B) calculates affordable housing need over the replacement plan period using the 'policy neutral' Welsh Government 2018 Principal Projection and the preferred growth option. The LHMA provides the latest evidence on affordable housing need, identifying a net annual need for 1,075 affordable units per annum for the next five-years and a further 154 units per annum over the following 10 years (BP10B, Executive Summary), resulting in a requirement for 6,915 affordable homes over the plan period (461 p/a) with a tenure split of 65% social rent and 35% intermediate. The Welsh Government note that the RLDP housing requirement is higher than the 2018 projections. Accordingly, to take this into account the affordable housing need for the RLDP is 502/yr which equates to a need of 7,530 over the plan period (RLDP, paragraph 6.116, Table 4).
Policy SP7 identifies a target of delivering a minimum of 3,070 affordable homes, the housing need being across all 13 Housing Market Areas, albeit it is more acute in Barry, Penarth, and Llantwit Major for 1-bed properties. The Welsh Government notes that most of the new housing development (51%) is proposed in the Key Settlement of Barry and Service Centre Settlements, which include Penarth and Llantwit Major.
The Welsh Government has no significant concerns regarding the relationship between the LHMA and the Deposit Plan.
Affordable Housing Led Sites
To deliver additional affordable housing above that which market led housing can provide, the authority proposes (Policy SP3 & HG4) to permit small scale affordable housing-led developments that provide a minimum of 50% affordable

housing on sites up to 25 dwellings in minor rural settlements and 50 dwellings in primary settlements. The principle of this approach is supported.
Paragraph 6.137 of the plan states:
“Policy HG4 makes provision for affordable housing-led sites in locations outside the Strategic Growth Area. These sites, which are allocated for a minimum of 50% affordable housing, are included within the settlement boundary.”
The reference to being within the settlement boundary is not referenced in policy HG4. It would be beneficial to either include such a reference or demonstrate that settlement boundaries do include those sites listed in policy HG4 for clarity.
These sites must be in addition to the market housing led requirement and identified in the LDP. This policy approach is justified by the high level of affordable housing need evidence by the LHMA and must be accompanied by additional control over the land by the local planning authority to 7

ensure effective delivery. Evidence should include ownership of the land, a binding legal agreement where the land is in private ownership or a resolution of the council to use compulsory purchase powers. RLDP, paragraph 6.133 references to such controls, however, should such controls be contained within the policy?
Affordable Housing Exceptions Sites
Policy HG5, states 100% affordable housing exception sites can be located outside a settlement boundary where they comply with PPW/TAN2 and any threshold/policy requirements set in the Deposit Plan. The Welsh Government supports this approach.
Employment Land
The Council’s Employment Land Study (BP12, March 2023) identifies a requirement for 67.80ha of employment land, which includes a 5-year buffer. The requirement is based on rolling forward past trends (over 25 years) and is of a sufficient scale to meet the 5,338 jobs forecast. However, Policy SP14 identifies employment land allocations totalling 182ha, which is an increase of around 114ha above the employment land requirement. The sites that make-up this supply are largely major employment allocations that attract significant regional inward investment at Cardiff Airport and Bro Tathan Enterprise Zone totalling 127.85ha (70%) of the total provision. The Welsh Government does not object to the over-provision of employment land in the plan. The Enterprise Zone designation must be identified and the allocations within it (SP14: 1-3).
Delivery and Implementation
PPW and the DPM (Chapter 5) contain guidance on the requirements in respect of the delivery and implementation of plans. The Deposit Plan should set out site-specific details for Key Sites that includes general phasing timescales, key infrastructure requirements, placemaking principles (including concept / schematic masterplan frameworks), constraints, and developer requirements, where appropriate. We note the Deposit Plan has included emerging master planning/infrastructure work on key sites.
The phasing, timing, funding, and delivery of Key Sites will be critical to ensure the plan delivers the scale of growth required over the plan period. This includes the relationship between the two Key Sites in St Athan (KS4 and KS5) totalling up to 1,150 units and the delivery of a new rail station in St Athan to meet the objectives of the strategy and encourage a modal shift to more sustainable forms of public transport.
The development sites may also impact on the trunk road network, in particular the M4 J34 and there will need to be a suitable level and form of traffic assessment to accompany the plan. (The transport case may consider the South East Wales Traffic Model as part of any masterplan impacts on the Strategic Road Network (SRN) (Wales Regional Transport Models | TfW)). The Council will also need to demonstrate that all housing components are deliverable through a housing trajectory prepared by the Council and Housing Stakeholder Group. Statements of Common Ground for key allocations, especially those that have ‘rolled over’ from the adopted plan, would be advantageous to demonstrate the sites are deliverable in the timescales set out.
The Deposit plan is supported by a high-level affordable housing study and site-specific viability appraisals for Key Sites. All viability work and must be prepared in conjunction with the Viability Steering Group and site-specific promoters.
It will be for the Council to justify deliverability supported by robust financial viability.
Gypsy and Travellers
The Gypsy and Traveller Accommodation Assessment GTAA (June 2022, approved June 2024) identifies a total need for 11 pitches over the plan period up to 2036, of which 9 pitches are ‘immediate’ by 2026. WG note that 4 pitches have since gained planning permission, reducing the remaining need over the plan period being 7 pitches. 8

Policy SP9 identifies a site at Llangan (0.76Ha) to accommodate the 7 pitches needed. It will be for the Council to demonstrate the appropriate site selection assessment process has been followed and that the site complies with requirements in PPW (4.2.35), Circular 005/2018 (paragraph 35) any relevant guidance and the DPM (5.80-5.85) to allocate a deliverable site in the plan period. The views of the relevant statutory bodies must also be agreed with no outstanding objections to the delivery of the site. The Welsh Government has no objection in terms of meeting the numerical need for gypsy traveller accommodation.
Renewable Energy
Future Wales: The National Plan 2040 identifies Barry as a District Heat Network (DHN) Priority Area. The Renewable Energy Assessment (BP15) explores the opportunity for a DHN using waste heat from Barry Biomass, but as there is some uncertainty on the future of the plant, the study concludes there is considerable risk to using the plant as a source waste heat. Could the Council provide an update on alternative options for a DHN in Barry?
It is welcome that the Renewable Energy Assessment (REA) has considered BMV policy, specifically for solar PV, and use of the Predictive ALC Map. The assessment has only considered non-BMV land (Subgrade 3b, Grade 4 and 5). The assessment would benefit from referencing the clarification provided in the DCPO letter of 1st March 2022 in respect of solar PV and BMV agricultural land for completeness.

The study identifies that in the Vale of Glamorgan solar development is more suitable than wind energy because of the flight path of aircraft in the south of the County Borough. However, there are some opportunities for wind sites, but these are likely to be small (<10MW) where aviation risks are lower and there is some grid access. Conversely, there are large expanses of land suitable for solar areas (>10MW) to the West of the County Borough, where there is little existing development. The study identifies 20 large-scale solar areas but recognises that grid constraints may impact the ability of sites to come forward.
Solar and wind search areas (where appropriate) below the 10MW Developments of National Significance (DNS) have been identified (Policy CC3). The plan also includes a criteria-based policy for all renewable energy proposals, particularly wind development, under 10MW (Policy CC4). Policy CC3 makes reference to adhering to the criteria in Policy CC4. However, would it not be the case that if search areas have been identified in Policy CC3 have they not already met the criteria? If they would not, should they be identified in the first place? Clarity would be beneficial. The Welsh Government supports the approach but seeks clarity on the point raised.
The Welsh Government notes the proposed search areas for wind energy near Morfa Ystrad Owen/Nant Rhydhalog, according to the Peatlands of Wales Evidence Score Map, the search area includes areas of peatland (Evidence Score 4). The site is also a SINC. This raises concerns as to how the inclusion of this search areas meets the policy test in PPW 6.4.15, 1a and 1b (Stepwise) regarding avoidance of irreplaceable peatland habitats and PPW 6.4.34.
Policy CC4 refers to Developments of National Significance (DNS) in 6.344 and 6.346. This should now refer to Strategic Infrastructure Projects (SIP) which replaced DNS.
Minerals
The Regional Technical Statement (RTS 2nd Review) identifies a nil apportionment for land-won sand and gravel provision in the Vale of Glamorgan. The Welsh Government policy clarification letter (dated 11 November 2021) identifies a surplus of 1.68mt of crushed rock. As there is a surplus of crushed rock reserves and a lack of sand and gravel production in the Vale, no specific allocations are required in the replacement plan. It is unclear whether a Statement of Sub-Regional Collaboration with adjoining authorities in the Cardiff City sub-region been agreed, or does the latest Position Statement (July 2022) explain how any shortfall will be met across 9

the region, particularly for crushed rock, of which the Vale has a surplus? Clarification would be beneficial.
BMV Agricultural Land
The Welsh Government has engaged with the Council for land quality advice, survey advice and ALC survey validation for candidate sites. The LPA has produced a specific topic paper on BMV policy application. BP23A. The Deposit RLDP allocates 188 hectares of housing land, 5.62 ha is identified as BMV land (under 3% of total housing allocations). The RLDP:
• Has sought to avoid BMV land wherever possible;
• Uses the Predictive ALC Map as a core evidence layer to inform: The spatial strategy;
• Settlement hierarchy decisions; and
• Candidate site assessments.
•
• Directs strategic growth to areas with least BMV land
• Removes or avoids allocations where BMV impacts were significant or unjustified.
• Quantifies total BMV loss and demonstrates it is minimal (5.62ha) and proportionate at plan level.
• Applies a sequential approach through: Preference for brownfield and non-BMV sites;
• Replacement of higher-BMV sites with lower-grade alternatives where possible.
•
• Requires site-specific ALC surveys to verify actual land quality before allocation.
• Demonstrates that allocated BMV land is: Often small, fragmented, or constrained;
• Sometimes previously disturbed or incapable of being farmed differently from surrounding lower-grade land; and
• Necessary to deliver the Plan’s housing strategy where reasonable alternatives are unavailable.
•

In conclusion, the Welsh Government consider the Authority has demonstrated a sensible and pragmatic approach to considering BMV loss in the context of national planning policy, and on that basis no objection is offered.
Green Infrastructure
Policy SP19 should explicitly reference the need for development to be accompanied by a Green Infrastructure Statement.
PPW12 requires decision makers to apply the step wise approach to GI, with enhancement secured at every stage where possible, there is no distinction made between the quality of the GI assets – the qualification in the policy statement that states proposals will incorporate measures that protect and enhance high quality multi-functional green infrastructure should be redrafted to remove the quality reference. The need to avoid an impact in the first instance should also be explicitly incorporated into the policy.
Criterion 1 (Policy SP20) should be redrafted – the stepwise approach in PPW 12 6.4.15 1a - does not distinguish between relative ecological value – the avoidance step applies to biodiversity in its widest sense (i.e. the variety of species and habitats and their abundance) and ecosystem functioning.
Welsh Language
There is limited reference to the Welsh language in the plan, either potential adverse impacts arising through development, or mechanisms via a policy framework to support and grow the use of the language. There are references to a number of Welsh-medium schools (3.26) and the increase in the number of people able to speak Welsh according to the 2011 census (3.52) but there is no mention of the authority's Welsh Language Strategy or promoting or cross-referencing to the aims of 10

Cymraeg 2050: A million Welsh-speakers. Paragraph 6.81 of the plan refers to development north west of Barry: "Land at North West Barry is allocated for a residential development of up to 376 dwellings and public open space. The site is in a sustainable location on the edge of the Barry, a key settlement, in a location that is well served by services and facilities, including a major supermarket, GP surgery, community centre, three primary schools (English Medium, Welsh Medium and Church in Wales) and two high schools (English and Welsh Medium) all located in reasonable walking distance. There is an active travel route along Port Road West, bus stops in close proximity providing buses to Llantwit Major, Cardiff and the centre of Barry. Barry station is 1.3 miles from the site entrance."
There is no mention that the Council want to undertake a Welsh Language Impact Assessment (WLIA) so there appears no attempt to measure the impact on the Welsh schools resulting from housing development? Could the Council clarify if such implications have already been covered in the WLIA for the plan, ISA, or are any specific policies necessary?

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/syf

5540 Support

Document Element: SP20 - BIODIVERSITY AND ECOSYSTEM RESILIENCE

Respondent: Mrs Hilary May [2309]

Summary:

This is very important, developments must allow and improve connectivity for species across the wider landscape - wildlife corridors etc. Avoiding sensitive sites by a good buffer margin to avoid disturbance by development.

Full text:

This is very important, developments must allow and improve connectivity for species across the wider landscape - wildlife corridors etc. Avoiding sensitive sites by a good buffer margin to avoid disturbance by development.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5723 Object

Document Element: SP20 - BIODIVERSITY AND ECOSYSTEM RESILIENCE

Respondent: Mr David Entwistle [3264]

Summary:

I support this in principle but feel it is too vague and weak. The council should be pushing for protection of species beyond statutory requirements and hold itself to a higher standard. There are always ways that local/on site nature based solutions can be incorporated and the statement saying off site measures can be considered is too weak and gives developers too much scope to bypass their requirements.

Full text:

I support this in principle but feel it is too vague and weak. The council should be pushing for protection of species beyond statutory requirements and hold itself to a higher standard. There are always ways that local/on site nature based solutions can be incorporated and the statement saying off site measures can be considered is too weak and gives developers too much scope to bypass their requirements.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5941 Object

Document Element: SP20 - BIODIVERSITY AND ECOSYSTEM RESILIENCE
Respondent: HBF (Mr Mark Harris) [538]

Summary:

The HBF suggests that the words 'functionally related' should be removed from the bold text at the end of the policy. Although the principle of this final paragraph is supported, the flexibility which it provides to developers is, in part, removed by the wording above. It is accepted planning practice that where something can not be provided on site, an off-site alternative can be acceptable, subject to the appropriate controls. However, limiting this to 'functionally relates' is onerous and unnecessary to achieve the aims of the policy.

Full text:

The HBF suggests that the words 'functionally related' should be removed from the bold text at the end of the policy. Although the principle of this final paragraph is supported, the flexibility which it provides to developers is, in part, removed by the wording above. It is accepted planning practice that where something can not be provided on site, an off-site alternative can be acceptable, subject to the appropriate controls. However, limiting this to 'functionally relates' is onerous and unnecessary to achieve the aims of the policy.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

6049 Support

Document Element: SP20 - BIODIVERSITY AND ECOSYSTEM RESILIENCE
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:

The proportionate approach to biodiversity mitigation and compensation, that provides allowance for planning obligations towards off-site habitat improvement and maintenance is consistent with Chapter 6 of PPW and therefore meets the first test of soundness (Does the Plan fit?). It is essential that options are retained to provide biodiversity mitigation off site as well as on site.

Full text:

Policy SP20 states that “Where development is considered appropriate and the on-site delivery of nature-based solutions is not feasible or sufficient, planning obligations and/or conditions will be used to secure and maintain compensatory off-site habitats and measures that are functionally related to the assets within the site and contribute to the wider local nature recovery priorities.”

The proportionate approach to biodiversity mitigation and compensation, that provides allowance for planning obligations towards off-site habitat improvement and maintenance is consistent with Chapter 6 of PPW and therefore meets the first test of soundness (Does the Plan fit?). It is essential that options are retained to provide biodiversity mitigation off site as well as on site.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

6082 Support

Document Element: SP20 - BIODIVERSITY AND ECOSYSTEM RESILIENCE
Respondent: Barratt Redrow Homes [2669]
Agent: Lichfields

Summary:

The proportionate approach to biodiversity mitigation and compensation, that provides allowance for planning obligations towards off-site habitat improvement and maintenance is consistent with Chapter 6 of PPW and therefore meets the first test of soundness (Does the Plan fit?). It is essential that options are retained to provide biodiversity mitigation off site as well as on site.

Full text:

Policy SP20 states that “Where development is considered appropriate and the on-site delivery of nature-based solutions is not feasible or sufficient, planning obligations and/or conditions will be used to secure and maintain compensatory off-site habitats and measures that are functionally related to the assets within the site and contribute to the wider local nature recovery priorities.”

The proportionate approach to biodiversity mitigation and compensation, that provides allowance for planning obligations towards off-site habitat improvement and maintenance is consistent with Chapter 6 of PPW and therefore meets the first test of soundness (Does the Plan fit?). It is essential that options are retained to provide biodiversity mitigation off site as well as on site.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

6140 Comment

Document Element: SP20 - BIODIVERSITY AND ECOSYSTEM RESILIENCE
Respondent: Mr Michael Priaulx [3452]

Summary:

The Green Infrastructure policies are welcome but overlook building-dependent species such as bats and red-listed endangered birds such as swifts, house sparrows and house martins.

Wales does not yet have planning guidance for these species but England has guidance based on British Standard BS 42021 for Integral Nest Boxes.

Therefore, please implement the equivalent of England national planning policy guidance (NPPG) Natural Environment 2025 paragraph 017, with regard to at least one swift brick per dwelling on average for new developments as these are a universal nest brick for small bird species, not included in quantitative biodiversity calculations so a separate policy is needed.

Please add, as house martins are a significant species in the Vale of Glamorgan with good availability of vegetated and waterside areas for foraging:

"Artificial nest cups for house martins may be specified as an alternative to swift bricks, where recommended by a suitably qualified ecologist."

Please also add the following, to ensure effective implementation:
"Post-construction stage confirmation of installation is required through photographs or verification by a suitably qualified ecologist."

Existing nest sites in buildings should be protected and retained where possible, and equivalent mitigation provided where this is not possible.

Full text:

The Green Infrastructure policies are welcome but overlook building-dependent species such as bats and red-listed endangered birds such as swifts, house sparrows and house martins.

Wales does not yet have planning guidance for these species but England has guidance based on British Standard BS 42021 for Integral Nest Boxes.

Therefore, please implement the equivalent of England national planning policy guidance (NPPG) Natural Environment 2025 paragraph 017 (https://www.gov.uk/guidance/natural-environment), with regard to at least one swift brick per dwelling on average for new developments as these are a universal nest brick for small bird species, not included in quantitative biodiversity calculations so a separate policy is needed.

Key text to include from the England NPPG is as follows:
"Developments should include integrated nest boxes (commonly known as swift bricks) where possible, with the general aim across a development of a minimum of one nest box per unit. Nest boxes can provide important habitat for other species as well as swifts, such as starlings and sparrows.
Extensive guidance is available on wildlife friendly features, including the National Design Guide and National Model Design Code which illustrate how well-designed places can support rich and varied biodiversity by facilitating habitats and routes for wildlife. More specific support for the selection and installation of swift bricks can be found in the British Industry Standard BS 42021:2022 the Future Homes Hub Homes for Nature Guidance, and the RSPB's Guide to Nestboxes. "

Please add, as house martins are a significant species in the Vale of Glamorgan with good availability of vegetated and waterside areas for foraging:

"Artificial nest cups for house martins may be specified as an alternative to swift bricks, where recommended by a suitably qualified ecologist."

Please also add the following, to ensure effective implementation:
"Post-construction stage confirmation of installation is required through photographs or verification by a suitably qualified ecologist."

Existing nest sites in buildings should be protected and retained where possible, and equivalent mitigation provided where this is not possible.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6175 Object

Document Element: SP20 - BIODIVERSITY AND ECOSYSTEM RESILIENCE

Respondent: Ms Lucie Taylor [2506]

Summary:

SF&G believe that food growing initiatives have multifaceted benefits, including contributing to the biodiversity goals under the Environment Wales Act, supporting wellbeing and net zero targets by 2035. The Vale of Glamorgan's Biodiversity Forward Plan aims to meet obligations to enhance biodiversity and ecosystem resilience. SF&G has experienced poor biodiversity provision in new school and housing developments through collaboration with KWT LPFN package delivery. Policies should ensure spaces for nature are integrated into developments. Furthermore, communities should be encouraged to include food growing sites in their Place Plans to enhance biodiversity and help address food security amidst global challenges.

Full text:

There needs to be more recognition that Food growing enterprises and projects have multi faceted benefits including contributing to local authority Section 6 duty under the Environment Wales Act (net biodiversity gain) and contributing to the areas Wellbeing goals, Contribution to net zero by 2035 .
"The Vale of Glamorgan Biodiversity Forward Plan (BFP) sets out how the Vale of Glamorgan Council shall meet its obligations under section 6 of the Environment (Wales) Act 2016 to demonstrate how the Local Authority will "seek to maintain and enhance biodiversity in the proper exercise of their functions and in doing so promote the resilience of ecosystems"."
Social Farms & Gardens and Keep Wales Tidy are meeting regularly with a Welsh Government forum, to work on the challenge of the poor delivery of spaces for biodiversity on new school sites and in new housing developments. When visiting new school sites to deliver 'Local Places for Nature' packages, we find that many of them are devoid of spaces for nature. The Council's duty under section 6 of the Environment (Wales) Act 2016, is to make sure biodiversity and sustainability are core themes of delivery. Policies in the LDP should look to improve the delivery and management of new development to ensure spaces for nature are delivered to the high standard that is needed.
The Vale's commitment to sign the Place Making Charter means it agrees to promote people and communities in the planning, design and management of new and existing places. The Vale's significant affordable housing need and investment in new schools across the plan area, is an opportunity to achieve this. The LDP should make reference to the requirement for high quality natural spaces to serve biodiversity and peoples' health and wellbeing on new development sites that are to be used to house and school our communities, especially in areas that are have low levels of nature, health and other inequalities. The effectiveness of delivery and management of these spaces should be monitored for compliance.

We also ask for the RLDP to provide wording within this or another policy or to provide guidance that encourages communities to think about including food growing sites in their Place Plans. Where will their food come from if the supermarkets do not have any available to them due to various world events and climate change?

Change suggested by respondent:

include text that improves biodiversity, natural spaces and green areas with the potential for food growing on new development sites. We have strong evidence that new sites are not providing as they should and local authorities have a duty to ensure they do.

Sound: No

Attachments: None

6642 Object

Document Element: SP20 - BIODIVERSITY AND ECOSYSTEM RESILIENCE

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA).
In short, where designated sites are identified in proximity to allocated sites it would be helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (together with addressing the meaning of “areas of high ecological value” will also go some way towards resolving the points we raise.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a ‘nature emergency’ and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan’s policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site

Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of “areas of high ecological value” will also go some way towards resolving the points we raise.
Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.
Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.
This will ensure that development in the area:
• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of ‘High Ecological Value’ (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger “policy hook” within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
“the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green

Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure
Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological

connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to ‘6 broad habitat types’ including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to ‘6 broad ecosystems’ to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP’s Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and

KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development

in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning

application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it "is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary".
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW's Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational
Pressure' within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs
clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

6643 Object

Document Element: SP20 - BIODIVERSITY AND ECOSYSTEM RESILIENCE

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12.

By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).

We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful for all development proposals.

Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting the nature emergency.

Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work.

We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.

With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive.

We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment. Please note also that, referring to paragraph 6.404 and 6.405, the requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to sites specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys. Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration at the project/planning application level and in master planning.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of

no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of "areas of high ecological value" will also go some way towards resolving the points we raise.
Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.
Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.
This will ensure that development in the area:
• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will

make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of 'High Ecological Value' (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific

comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure
Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological
connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to ‘6 broad habitat types’ including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to ‘6 broad ecosystems’ to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP’s Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species

specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed

elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous

applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it “is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary”.
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW’s Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of ‘Policy DNP8 – Severn Estuary Recreational
Pressure’ within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of

the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

6652 Comment

Document Element: SP20 - BIODIVERSITY AND ECOSYSTEM RESILIENCE

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

KEY SITES
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity

within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of “areas of high ecological value” will also go some way towards resolving the points we raise.
Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.
Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.
This will ensure that development in the area:
• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of ‘High Ecological Value’ (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.

The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we

consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure
Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological
connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to ‘6 broad habitat types’ including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to ‘6 broad ecosystems’ to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP’s Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice

(strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
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Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
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SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it "is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary".
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW's Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational
Pressure' within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs
clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the

12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

6790 Comment

Document Element: SP20 - BIODIVERSITY AND ECOSYSTEM RESILIENCE
Respondent: Persimmon Homes (East Wales) [1068]
Agent: Boyer Planning

Summary:

In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon

consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.

Housing Market and Housing Need

In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.

Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.

Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.

Section 4: Key Themes, Vision & Objectives

Key Themes

Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.

In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.

Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.

Vision

In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.

The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.

In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.

Strategic Objectives

Objective 3 – Home for All

Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.

Objective 4 – Placemaking

As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.

Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.

Objective 8 – Promoting Active and Sustainable Travel Choices

Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.

Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.

Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.
Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will

facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.
In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much

needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.

For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.

In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).

In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.

Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh

Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement
From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.
In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.
Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.
Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.
Policy SSC1 – Development within Settlement Boundaries
Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance

on private vehicle travel.
Policy SP4 – Placemaking
In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.
In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car.
Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.
The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.
Policy PGD1 – Creating Well Designed and Inclusive Places
Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.
On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact

with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes

Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
Loss of Allocated Employment Land
Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
Policy HG3 – Housing Led Redevelopment Opportunity

Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
Policy SP7 – Affordable Housing Provision
In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
Policy SP8 – Affordable Housing Requirements
Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.
Policy SP10 – Sustainable Transport
Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.
In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.

Policy TR1 – Transport Proposals
Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.
In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.
Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.
Policy SP13 – Community Infrastructure and Planning Obligations
Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
Policy CI1 – Open Space Provision
Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.
The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.
Productive and Enterprising Places
Policy CC1 – Residential Operational Net Zero Carbon Development
Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.
Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.
The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.
Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.
Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that

Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.

Distinctive and Natural Places

Policy SP19 – Green Infrastructure

In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.

For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.

The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.

Policy SP20 – Biodiversity and Ecosystem Resilience

In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Policy DNP1 – Special Landscape Areas

Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.

Policy DNP2 – Green Wedges

Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.

Policy DNP8 – Severn Estuary Recreational Pressure

Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.

The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.

From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.

Conclusion

Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes' most pertinent comments on the consultation document are summarised below:

• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not

only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/38r

7034 Comment

Document Element: SP20 - BIODIVERSITY AND ECOSYSTEM RESILIENCE

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding areas of 'High Ecological Value' (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We

appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.
We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.
By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.
We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.
With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.
Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.
It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of "areas of high ecological value" will also go some way towards resolving the points we raise.
Master Planning
We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.
Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.
Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.
Strategic Opportunity at Bro Tathan
In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.
This will ensure that development in the area:
• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.
Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.
Areas of High Ecological Value
As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of 'High Ecological Value' (criterion 1 of SP20). We have not been able to establish where these areas are or how

their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.
2. Integrated Sustainability Assessment (ISA)
With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.
The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.
We agree with these recommendations and would go further in advising that all allocations and their associated policies should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered.
We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the

removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure
Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological
connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to ‘6 broad habitat types’ including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to ‘6 broad ecosystems’ to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP’s Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it “is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary”.
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW’s Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of ‘Policy DNP8 – Severn Estuary Recreational
Pressure’ within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of ‘Policy DNP8 –

Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

7202 Support

Document Element: SP20 - BIODIVERSITY AND ECOSYSTEM RESILIENCE
Respondent: H Jones, L Sungur and P John [3741]
Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

The above Policy is in accordance with Chapter 6 PPW.
The approach is supported and dovetails with SP19.

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis. Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

The inclusion of the site within the settlement boundary is logical especially when viewed in the context of the linear settlement of Fferm Goch. In addition the site is further suited to development allocation as the northern and southern boundaries are built up and the main road runs along the eastern boundary. A flexible approach is encouraged with regard to the delivery of the dwellings in relation to a variety of factors and policy provisions including the housing needs across the Vale, the limit on numbers of rural affordable led sites in minor rural settlements, viability implications relating to obligations/carbon Zero and sustainability obligations and the potential to extend the allocation if the need for homes requires.

The 3 land owners remain committed to this development and local developers are waiting to deliver the allocation.

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision

• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

The test of soundness for a Local Development Plan (LDP) is a critical component of the planning process to ensure that the plan is prepared in accordance with legal and procedural
requirements. It involves demonstrating that the plan is 'sound' based on three tests set out by the Welsh Government in the Development Plans Manual (Edition 3). These tests have therefore been considered in our representation, the tests include:

• Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)
• Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
• Test 3: Will the plan deliver (i.e. is it likely to be effective?)

SP1 – Sustainable Growth Strategy

The promotion of small scale affordable housing led development outside of the SGA, as proposed by SP1 is important as this provides essential affordable and market homes in the rural locations of the Vale as well as the SGA. Their provision is critical in meeting the area's housing needs, particularly affordable dwellings and supporting rural community stability, and ensuring that all parts of the Vale remain a place where people of all incomes are able to live and thrive during the plan period to 2036 and beyond.

The essence of Policy SP1 is supported, however it is well documented that there is a backlog in delivery of affordable homes and the need for affordable housing in the Vale is exacerbated by the high prevalence of single person households plus households comprising couples with no children, The Vale also has one of the highest affordability pressures in Wales. As stated in the 2023 Local Housing Market Assessment (LHMA) for the Vale of Glamorgan , the median house price in the Vale is around 8 times the median household income, well above the affordability threshold of 4.5 to 5 times household income for borrowing purposes. Private rents have also risen sharply in the area, commonly placing them out of reach for many low-to-middle income households. All of the above place further pressure on the need to deliver affordable homes in the locality.

The LHMA identifies a need for 1,075 affordable homes per year over the next 5 years based on principal projections (or 1,114 based on the RLDP projections). As mentioned previously past delivery rates fall significantly short and therefore a backlog is present, however despite the reported backlog the RLDP only proposes 3,070 (205/annum) affordable dwellings over the plan period to 2036. Despite the growth strategy of policy SP1 and allocations made through the RLDP, the figure of proposed affordable dwelling numbers is concerning as it falls significantly short of the demand evidenced within the most recent evidence of LHMA of 2023.

The housing figures quoted in SP1 indicate 7,890 dwellings (including the 3,070 affordable dwellings) to 2036, however these figures overall are inadequate over the plan period when considered against the 2022 WG household projections. The 2022-based household projections provide an indication of the future number of households, and their composition, based on population projections and assumptions about households from recent censuses. The vale of Glamorgan demonstrates an increase of almost 12% in the number of households between mid-2022 and mid-2032; note this is the highest percentage increase by Local authority in Wales and way above the average for Wales as a whole (that stands at around 7% increase). The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both open market, but particularly Affordable) development across the Vale.

Without targeted allocations outside of the SGA, as outlined in Policy SP1, the gap described above will continue to widen, forcing more residents to leave the area and weakening community cohesion.

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the
RLDP the supporting text of Policy SP2 states:
'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

sustainable growth. Locating affordable-led developments in areas with existing infrastructure such as primary schools

will reduce car dependency, lower carbon emissions, and contribute to the Council's climate change commitments.

Considering the above, the limit on small scale rural affordable housing led developments (RAHLD) to 25 for these settlements is questioned and further flexibility recommended on a case by case basis. It is understood the limit on numbers was imposed due to the existing scale of the settlement in which the RAHLD are located, however those allocations will only likely deliver at 50% affordable and therefore only provide 12.5 (or 13) affordable units as a maximum (note Fferm Goch would provide 11 affordable dwellings on current figures of 22 total dwellings). Given the concerns raised in response to Policy SP1 there remains an issue of whether the numbers proposed in the RLDP can meet the demonstrable need for affordable homes and if there is scope on a RAHLD to sensitively increase unit numbers without any material harm then the policy should be flexible to accommodate this.

Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the range of facilities and services provided in these settlements. It is also supported that these settlements are able to provide affordable led residential development of up to 50 dwellings (delivering 25 affordable units). However the provision of an increased number of units in the Primary Non SGA settlements must not be at the expense of a wider number of smaller rural sites with the ability to sustain smaller communities across the Vale, especially given the shortfall in numbers as outlined above.

PGD2 – Residential Development Densities

The best use of finite land is set out in PPW and consistent with the setting of the densities as prescribed in policy PGD2. The policy is considered to meet the 3 tests of soundness.

The approach of policy PGD2 is also supported through the proposed density of the site North of Westwinds business park, Fferm Goch in HG4 (4). This allocation that proposes to provide a density of just over 30/ha within Fferm Goch, a minor rural settlement.

SP6 – Housing Requirement

Affordable housing forms an important part of the housing requirement figures of Policy SP6. Whilst the total 122 dwellings proposed under policy HG4 is a relatively small contribution to the overall figures it provides important spatial distribution of homes across the Vale within the rural area.

Given the concerns raised with regard to Policy SP1 there is fear that the affordable housing numbers will not be sufficient to meet need. The site north of Westwinds business park, Fferm Goch has the ability to expand to the south (as per the CS Ref 398) in order to accommodate additional dwellings (both market and affordable dwellings in order to sustain the viability of the site).

SP7 – Affordable Housing Provision

In accordance with Policy SP7 the allocated site HG4(4) at Fferm Goch provides a range of tenures, types and sizes in response to the LHMA, waiting list data and Older persons housing strategy in order to provide for 11 dwelling units and contributing toward the 3,070 affordable requirement to 2036. Changes in the household composition mean more single person and small homes are required, plus older person accommodation for those wishing to downsize and stay in the area.

Please see comments for Policy SP1 / Policy SP2 above regards concern over the proposed housing numbers and supply of affordable homes against demand - this therefore brings the Deliverability of the plan in to question (Test of Soundness 3).

SP8 – Affordable Housing Requirements

Policy SP8 is supported in so far as contributing much needed affordable housing development commensurate with the size of the settlement in which it sits. We are encourage to see reference to the provision of affordable housing to be negotiated on a site by site basis considering evidenced viability fo the development.

The affordable dwellings proposed foster stability in rural areas by allowing a range of households (from single person to growing families) to stay in their local area.

Policy SP8 states 40% affordable for those developments in primary and minor settlements outside of the SGA yet 50% requirement on affordable housing led allocations in minor rural settlements (also outside of the SGA). This appears inconsistent and penalising those smaller rural sites that will already be more delicately balanced in viability terms by virtue of their limited size of 25 units. Further viability issues covered in other policies (such as SP20, relating to biodiversity, Net Zero and sustainability credentials must (with the required evidence submitted and assessed by the council as stated in Policy SP8) be flexibly reviewed to ensure sites are viable and deliverable as recognised by the Council, there is a danger the stringent requirements, especially for smaller sites, could render those sites unviable in the current climate with rising build costs.

HG4 – Rural affordable housing led sites

The allocation of land north of West Winds Business Park under policy HG4(4) for rural affordable housing led development of 22 units is strongly supported. Then allocation will assist in delivering homes in the rural Vale and contribute to the important stability to the settlement of Fferm Goch to 2036.

The extension of the settlement limit including the site north of West Winds Business Park is supported. The site provides an obvious infill to the small break in the built up area to both the north and south of the site, with the main road running to the eastern boundary of the site.

The inclusion of the site within the settlement of Fferm Goch is logical and in harmony with the existing linear settlement.

The proposal supports the aims of the Local Development Plan and the Welsh Government's commitment to increasing affordable housing supply. By providing for affordable led allocations the policy aligns with the Well-being of Future Generations (Wales) Act 2015 in aiming to promote a healthier, more equal, and cohesive community.

There is concern however surrounding the number of dwellings proposed and if the Plan seeks sufficient dwellings and affordable provision given the predicted need to 2036 shown in the LMHA.

SP13 – Community infrastructure and planning obligations

Policy SP13 demonstrates the importance of community infrastructure in sustaining both the residents well being and economic growth of an area. See also the response to Policy SP2 that refers to the allocation of housing in the rural areas specifically supporting those settlements with local primary school provision.

The viability of developments however must not be compromised in order to ensure delivery of the plan. To see in Policy SP13 that 'development viability' is recognised as a key factor in delivering community infrastructure under planning obligations, is supported. It is recommended that this recognition is replicated in other policies of the LDP in order that the third Test of soundness can be fully met; Deliverability – ensuring the plan is likely to be effective). See comments in relation to Policies SP8/CC1/SP16/CI1.

CI1 – Open Space Provision

Provision of open space in residential developments is supported. HG4(4) promotes open space within the draft allocation.

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

The provisions of SP16 are generally supported as practical measures to ensure important sustainable development is achieved.

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

Provision of Green Infrastructure in residential, and all developments is supported.

HG4(4) retains and enhances existing and will promote green infrastructure on the draft allocation.

The viability of developments however must not be compromised through green infrastructure provision - in order to ensure delivery of the plan. The 'development viability' should therefore be recognised as a key factor in delivering Green Infrastructure. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

Fferm Goch is one of the settlements that remains fully within and covered by the Upper and Lower Thaw Valley Special Landscape Area (SLA). It is noted that in such settlements, while there have been amendments to the identified settlement boundary (inclusion of HG4 (4) rural affordable led housing allocation) this has not affected the SLA designation in these areas. (Background Paper 45; Paragraph 1.16 refers).

The location of the small allocated site HG4(4) is nestled within the settlement of Fferm Goch. It is built up on both the northern and southern boundaries, with the main road running along the eastern boundary. There is no unacceptable harm to the SLA of the Upper and Lower Thaw valley.

The allocation of the site for residential development does not give rise to unacceptable harm to the special qualities and characteristics of the SLA, based on LANDMAP information, continues to be preserved.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

6791 Support

Document Element: Cwrt-yr-Ala Basin.

Respondent: Persimmon Homes (East Wales) [1068]
Agent: Boyer Planning

Summary:

Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):

- Test 1 – Does the Plan Fit?
- Test 2 – Is the Plan Appropriate?
- Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
Section 4: Key Themes, Vision & Objectives
Key Themes
Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.
In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.
Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.

Vision
In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.
The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.
In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All
Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.
Objective 4 – Placemaking
As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.
Objective 8 – Promoting Active and Sustainable Travel Choices
Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.
Section 5: Sustainable Growth Strategy
RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably

lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.
Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.
In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by

prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority. Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making

perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.
Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual
As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement
From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified "has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area." It also notes that this level of growth has been chosen so that it is "complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).".
Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst

Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.

In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

Policy SP2 – Settlement Hierarchy

In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.

Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.

Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.

Policy SSC1 – Development within Settlement Boundaries

Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.

Policy SP4 – Placemaking

In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.

The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.

In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car. Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.

The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.

Policy PGD1 – Creating Well Designed and Inclusive Places

Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.

On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than

the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing

services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
Loss of Allocated Employment Land
Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small

industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
Policy HG3 – Housing Led Redevelopment Opportunity
Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
Policy SP7 – Affordable Housing Provision
In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the

plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.

Policy SP8 – Affordable Housing Requirements

Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.

On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.

Policy SP10 – Sustainable Transport

Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.

In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.

In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.

Policy TR1 – Transport Proposals

Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.

In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.

Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.

Policy SP13 – Community Infrastructure and Planning Obligations

Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.

Policy CI1 – Open Space Provision

Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.

The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.

Productive and Enterprising Places
Policy CC1 – Residential Operational Net Zero Carbon Development
Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.
Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.
The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.
Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.
Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.
Distinctive and Natural Places
Policy SP19 – Green Infrastructure
In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.
The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.
Policy SP20 – Biodiversity and Ecosystem Resilience
In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.

Policy DNP1 – Special Landscape Areas
Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.
Policy DNP2 – Green Wedges
Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.
Policy DNP8 – Severn Estuary Recreational Pressure
Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
The policy also provides no clear threshold or criteria for determining what level of activity would constitute “visitor pressure” or an “adverse impact” on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan’s ability to meet its housing requirements and risk finding the RLDP unsound.
Conclusion
Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes’ most pertinent comments on the consultation document are summarised below:
• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale’s position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan’s ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government’s Future Homes Standard (FHS), which is intended to ensure all new homes are “zero-carbon ready” through a consistent national Building Regulations framework.
• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys’ (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council’s proposed housing trajectory.

Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/38r

6924 Object

Document Element: Dyffryn Basin & ridge slopes;

Respondent: Barratt Redrow Homes [2669]

Agent: Boyer Planning

Summary:

Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.

As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).

Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.

However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.

A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east.

The visual appraisal establishes that site development has
the potential to partially change the appearance of this edge within available views.

However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.

When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.

Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.

Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be
removed.

Full text:

1. INTRODUCTION
1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.
1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:

• Section 3 – The Vale of Glamorgan Key Characteristics;
• Section 4 – RLDP Key Themes, Vision, and Objectives;
• Section 5 – Sustainable Growth Strategy; and
• Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.
1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS
Settlement Pattern
2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.
2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Need
2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
3. RLDP KEY THEMES, VISION, AND OBJECTIVES
3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.
Key Themes
3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the

role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY
Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which

is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make

provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.

5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.

5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.

5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.

5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

5.10 For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

5.11 More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

5.12 Whilst Barratt Redrow appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range, having reviewed the Deposit Plan evidence base Barratt Redrow believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.

5.13 In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

5.14 Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).

5.15 In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

5.16 In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any

evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need. Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036) and therefore is made up of

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.

5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.

5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.

5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.

5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.

5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.

5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.

5.27 In summary, Barratt Redrow acknowledge the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

5.28 These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance and additional site allocations, such as Swn Y Coed, Wenvoe, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development

Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
5.29 Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.
5.30 Accordingly, despite Wenvoe being identified as a primary settlement, Policy SP2 notes that development in this location will be limited to 'the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.' Similarly, it is noted that Policy SP2 does not consider Wenvoe to be an appropriate location for ''substantial additional growth''.
5.31 Barratt Redrow object to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified.
5.32 First of all, the Deposit Plan acknowledges that it performs a similar function to the Primary Settlements located within the Strategic Growth Area and it is described as one of the 'sustainable communities' in The Vale of Glamorgan Key Characteristics section, as noted previously in Section 3.
5.33 Likewise, the site benefits from excellent accessibility the local public transport network, active travel routes and local services. These characteristics fully accord with Welsh Government's strategic objectives and emphasise the fact that Swn Y Coed constitutes an appropriate location for future housing.
5.34 With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge''. Barratt Redrow do not consider this to be sufficient justification to discount the site from allocation as there would be limited impact on BMW agricultural land arising from the development of Swn Y Coed.

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available.
5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.
Policy SP4 - Placemaking
5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.
5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:
5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.
5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.
5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.
5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
Policy PGD1 – Creating Well Designed and Inclusive Places
5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy

framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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Unsustainable Location & Poor Connectivity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the

level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.

• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.

• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.

• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.

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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.

• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.

• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.

• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.

• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.

• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.

• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.

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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
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• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply
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• HG1 (8) St Athan - Clive Road, St Athan

Policy HG3 – Housing Led Redevelopment Opportunity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.

• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent

national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).

• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).

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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4).Finally, the Council's own Viability Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.

• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.

• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.

• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.

• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:

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Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:

i. Space heating demand less than or equal to 40kWh/m2/year;

ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.

• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.

• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not

considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
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Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is

very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established 'defensible' limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be 'largely shielded from view by woodland blocks/strips'.
• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for 'infilling' the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.
• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
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Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
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Policy DNP8 – Severn Estuary Recreational Pressure

SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.
• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
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MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
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• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
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Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
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CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the Council's vision for the VoG.
• 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These

principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
• 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
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6. CONCLUSION
• Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.
• Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swn Y Coed, are necessary to ensure the RLDP is able to effectively meet
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Barratt Redrow welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Barratt Redrow support the requirements for affordable housing in new development. In its current form the proposed policies SP7 and SP8 lack sufficient flexibility for site specific circumstances and physical constraints which may impact upon delivery. This inevitably creates uncertainty for a number of sites, where the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities.
• From a planning perspective it is also important to recognise the additional benefits the site (Candidate Site Ref No. 437) could provide in accommodating the increased housing need generated by the suggested 15% flexibility allowance within a highly sustainable location. The principles of which clearly align with the Council's aspirations and would maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3ch

7203 Comment

Document Element: DNP1 - SPECIAL LANDSCAPE AREAS
Respondent: H Jones, L Sungur and P John [3741]
Agent: Herbert R Thomas Commercial Agents Cardiff

Summary:

Fferm Goch is one of the settlements that remains fully within and covered by the Upper and Lower Thaw Valley Special Landscape Area (SLA). It is noted that in such settlements, while there have been amendments to the identified settlement boundary (inclusion of HG4 (4) rural affordable led housing allocation) this has not affected the SLA designation in these areas. There is no unacceptable harm to the SLA of the Upper and Lower Thaw valley.

Full text:

Strong support is expressed for the proposed allocation at Land north of Westwinds, Fferm Goch of rural affordable-led housing within the Vale of Glamorgan Draft Local Development Plan (LDP) under policy HG4(4).
As part of our comments to the above policy consideration must be attributed to viability on a site specific basis.

Furthermore, questions are raised over whether sufficient affordable dwellings are proposed to 2036 in the Vale given current trends and forecasts.

The inclusion of the site within the settlement boundary is logical especially when viewed in the context of the linear settlement of Fferm Goch. In addition the site is further suited to development allocation as the northern and southern boundaries are built up and the main road runs along the eastern boundary. A flexible approach is encouraged with regard to the delivery of the dwellings in relation to a variety of factors and policy provisions including the housing needs across the Vale, the limit on numbers of rural affordable led sites in minor rural settlements, viability implications relating to obligations/carbon Zero and sustainability obligations and the potential to extend the allocation if the need for homes requires.

The 3 land owners remain committed to this development and local developers are waiting to deliver the allocation.

In summary the extension to the settlement boundary of Fferm Goch, to include the allocation HG4(4) is supported. The attached representation is made under the following policies:
• Policy SP1 – Sustainable Growth Strategy
• Policy SP2 – Settlement Hierarchy
• Policy PGD2 – Residential Development Densities
• Policy SP6 – Housing Requirement
• Policy SP7 – Affordable housing provision
• Policy SP8 – Affordable housing requirements
• Policy HG4 – Rural Affordable Housing Sites
• Policy SP13 – Community Infrastructure and planning obligations
• Policy CI1 – Open space provision
• Policy SP16 – Climate change mitigation and adaptation
• Policy DNP1 – Special landscape Areas

The test of soundness for a Local Development Plan (LDP) is a critical component of the planning process to ensure that the plan is prepared in accordance with legal and procedural
requirements. It involves demonstrating that the plan is 'sound' based on three tests set out by the Welsh Government in the Development Plans Manual (Edition 3). These tests have therefore been considered in our representation, the tests include:

• Test 1: Does the plan fit? (i.e. is it clear that the LDP is consistent with other plans?)
• Test 2: Is the plan appropriate? (i.e. is the plan appropriate for the area in the light of the evidence?)
• Test 3: Will the plan deliver (i.e. is it likely to be effective?)

SP1 – Sustainable Growth Strategy

The promotion of small scale affordable housing led development outside of the SGA, as proposed by SP1 is important as this provides essential affordable and market homes in the rural locations of the Vale as well as the SGA. Their provision is critical in meeting the area's housing needs, particularly affordable dwellings and supporting rural community stability, and ensuring that all parts of the Vale remain a place where people of all incomes are able to live and thrive during the plan period to 2036 and beyond.

The essence of Policy SP1 is supported, however it is well documented that there is a backlog in delivery of affordable homes and the need for affordable housing in the Vale is exacerbated by the high prevalence of single person households plus households comprising couples with no children, The Vale also has one of the highest affordability pressures in Wales. As stated in the 2023 Local Housing Market Assessment (LHMA) for the Vale of Glamorgan , the median house price in the Vale is around 8 times the median household income, well above the affordability threshold of 4.5 to 5 times household income for borrowing purposes. Private rents have also risen sharply in the area, commonly placing them out of reach for many low-to-middle income households. All of the above place further pressure on the need to deliver affordable homes in the locality.

The LHMA identifies a need for 1,075 affordable homes per year over the next 5 years based on principal projections (or 1,114 based on the RLDP projections). As mentioned previously past delivery rates fall significantly short and therefore a backlog is present, however despite the reported backlog the RLDP only proposes 3,070 (205/annum) affordable dwellings over the plan period to 2036. Despite the growth strategy of policy SP1 and allocations made through the RLDP, the figure of proposed affordable dwelling numbers is concerning as it falls significantly short of the demand evidenced within the most recent evidence of LHMA of 2023.

The housing figures quoted in SP1 indicate 7,890 dwellings (including the 3,070 affordable dwellings) to 2036, however these figures overall are inadequate over the plan period when considered against the 2022 WG household projections. The 2022-based household projections provide an indication of the future number of households, and their composition, based on population projections and assumptions about households from recent censuses. The vale of Glamorgan demonstrates an increase of almost 12% in the number of households between mid-2022 and mid-2032; note this is the highest percentage increase by Local authority in Wales and way above the average for Wales as a whole (that stands at around 7% increase). The concern is whether Policy SP1 goes far enough in providing for the scale of housing (both

open market, but particularly Affordable) development across the Vale.

Without targeted allocations outside of the SGA, as outlined in Policy SP1, the gap described above will continue to widen, forcing more residents to leave the area and weakening community cohesion.

SP2 – Settlement Hierarchy

Policy SP2 states a range of rural settlements are categorised as 'Minor Rural Settlements'. Within the RLDP the supporting text of Policy SP2 states:
'several of the smaller rural settlements such as Colwinston, St Nicholas and Fferm Goch include primary schools that serve a wider catchment area, whilst others also provide small scale local employment opportunities, either within or near the settlements. Due to these functional links between rural settlements, it is essential to ensure that existing services and facilities are safeguarded, supported, or enhanced where appropriate'.(Paragraph 6.16)
Fferm Goch is categorised as a Minor rural settlement within the Settlement hierarchy and given its size and range of facilities/services this is supported. It is noted however that both Fferm Goch and Colwinston are identified as serving a wider catchment due to the provision of their primary schools. The allocation of HG4 site at Fferm Goch will further support and sustain the following:
• The Llangan primary school that sits in the southern portion of the settlement boundary.
• The existing employment site of WestWinds Business Park.
• The community hall (Llangan and St Mary Hill Village Hall) to the north of the settlement.
These existing services and facilities should be supported and sustained through the new housing allocation (HG4(4) in the immediate locality. This allocation supports the Vale's own strategic objectives for

sustainable growth. Locating affordable-led developments in areas with existing infrastructure such as primary schools will reduce car dependency, lower carbon emissions, and contribute to the Council's climate change commitments.

Considering the above, the limit on small scale rural affordable housing led developments (RAHLD) to 25 for these settlements is questioned and further flexibility recommended on a case by case basis. It is understood the limit on numbers was imposed due to the existing scale of the settlement in which the RAHLD are located, however those allocations will only likely deliver at 50% affordable and therefore only provide 12.5 (or 13) affordable units as a maximum (note Fferm Goch would provide 11 affordable dwellings on current figures of 22 total dwellings). Given the concerns raised in response to Policy SP1 there remains an issue of whether the numbers proposed in the RLDP can meet the demonstrable need for affordable homes and if there is scope on a RAHLD to sensitively increase unit numbers without any material harm then the policy should be flexible to accommodate this.

Wick and Culverhouse Cross have been elevated to Primary Settlements outside the SGA; this is supported given the range of facilities and services provided in these settlements. It is also supported that these settlements are able to provide affordable led residential development of up to 50 dwellings (delivering 25 affordable units). However the provision of an increased number of units in the Primary Non SGA settlements must not be at the expense of a wider number of smaller rural sites with the ability to sustain smaller communities across the Vale, especially given the shortfall in numbers as outlined above.

PGD2 – Residential Development Densities

The best use of finite land is set out in PPW and consistent with the setting of the densities as prescribed in policy PGD2. The policy is considered to meet the 3 tests of soundness.

The approach of policy PGD2 is also supported through the proposed density of the site North of Westwinds business park, Fferm Goch in HG4 (4). This allocation that proposes to provide a density of just over 30/ha within Fferm Goch, a minor rural settlement.

SP6 – Housing Requirement

Affordable housing forms an important part of the housing requirement figures of Policy SP6. Whilst the total 122 dwellings proposed under policy HG4 is a relatively small contribution to the overall figures it provides important spatial distribution of homes across the Vale within the rural area.

Given the concerns raised with regard to Policy SP1 there is fear that the affordable housing numbers will not be sufficient to meet need. The site north of Westwinds business park, Fferm Goch has the ability to expand to the south (as per the CS Ref 398) in order to accommodate additional dwellings (both market and affordable dwellings in order to sustain the viability of the site).

SP7 – Affordable Housing Provision

In accordance with Policy SP7 the allocated site HG4(4) at Fferm Goch provides a range of tenures, types and sizes in response to the LHMA, waiting list data and Older persons housing strategy in order to provide for 11 dwelling units and contributing toward the 3,070 affordable requirement to 2036. Changes in the household composition mean more single person and small homes are required, plus older person accommodation for those wishing to downsize and stay in the

area.

Please see comments for Policy SP1 / Policy SP2 above regards concern over the proposed housing numbers and supply of affordable homes against demand - this therefore brings the Deliverability of the plan in to question (Test of Soundness 3).

SP8 – Affordable Housing Requirements

Policy SP8 is supported in so far as contributing much needed affordable housing development commensurate with the size of the settlement in which it sits. We are encourage to see reference to the provision of affordable housing to be negotiated on a site by site basis considering evidenced viability fo the development.

The affordable dwellings proposed foster stability in rural areas by allowing a range of households (from single person to growing families) to stay in their local area.

Policy SP8 states 40% affordable for those developments in primary and minor settlements outside of the SGA yet 50% requirement on affordable housing led allocations in minor rural settlements (also outside of the SGA). This appears inconsistent and penalising those smaller rural sites that will already be more delicately balanced in viability terms by virtue of their limited size of 25 units. Further viability issues covered in other policies (such as SP20, relating to biodiversity, Net Zero and sustainability credentials must (with the required evidence submitted and assessed by the council as stated in Policy SP8) be flexibly reviewed to ensure sites are viable and deliverable as recognised by the Council, there is a danger the stringent requirements, especially for smaller sites, could render those sites unviable in the current climate with rising build costs.

HG4 – Rural affordable housing led sites

The allocation of land north of West Winds Business Park under policy HG4(4) for rural affordable housing led development of 22 units is strongly supported. Then allocation will assist in delivering homes in the rural Vale and contribute to the important stability to the settlement of Fferm Goch to 2036.

The extension of the settlement limit including the site north of West Winds Business Park is supported. The site provides an obvious infill to the small break in the built up area to both the north and south of the site, with the main road running to the eastern boundary of the site.

The inclusion of the site within the settlement of Fferm Goch is logical and in harmony with the existing linear settlement.

The proposal supports the aims of the Local Development Plan and the Welsh Government's commitment to increasing affordable housing supply. By providing for affordable led allocations the policy aligns with the Well-being of Future Generations (Wales) Act 2015 in aiming to promote a healthier, more equal, and cohesive community.

There is concern however surrounding the number of dwellings proposed and if the Plan seeks sufficient dwellings and affordable provision given the predicted need to 2036 shown in the LMHA.

SP13 – Community infrastructure and planning obligations

Policy SP13 demonstrates the importance of community infrastructure in sustaining both the residents well being and economic growth of an area. See also the response to Policy SP2 that refers to the allocation of housing in the rural areas specifically supporting those settlements with local primary school provision.

The viability of developments however must not be compromised in order to ensure delivery of the plan. To see in Policy SP13 that 'development viability' is recognised as a key factor in delivering community infrastructure under planning obligations, is supported. It is recommended that this recognition is replicated in other policies of the LDP in order that the third Test of soundness can be fully met; Deliverability – ensuring the plan is likely to be effective). See comments in relation to Policies SP8/CC1/SP16/CI1.

CI1 – Open Space Provision

Provision of open space in residential developments is supported. HG4(4) promotes open space within the draft allocation.

The viability of developments however must not be compromised in order to ensure delivery of the plan. The 'development viability' should recognised as a key factor in delivering open space (see comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP16 - Climate change Mitigation and Adaptation

The provisions of SP16 are generally supported as practical measures to ensure important sustainable development is

achieved.

CC1 – Residential Operational Net Zero Carbon Development

The provisions of Policy CC1 echo the WG targets for Net Zero by 2050.
Whilst some of the supporting text to policy CC1 references viability, the ultimate viability of developments however must not be compromised in order to ensure delivery of the plan. The technical feasibility of renewable energy regeneration is referenced in the above policy however the 'development viability' should also be included. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP19 – Green Infrastructure

Provision of Green Infrastructure in residential, and all developments is supported.

HG4(4) retains and enhances existing and will promote green infrastructure on the draft allocation.

The viability of developments however must not be compromised through green infrastructure provision - in order to ensure delivery of the plan. The 'development viability' should therefore be recognised as a key factor in delivering Green Infrastructure. See comments on SP13 / SP8 where evidenced viability is specifically referenced within those policies – this approach is supported.

SP20 – Biodiversity and Ecosystem resilience

The above Policy is in accordance with Chapter 6 PPW. The approach is supported and dovetails with SP19 above.

DNP1 – Special Landscape Areas

DNP1 identified Special Landscape Areas across the Vale.

Fferm Goch is one of the settlements that remains fully within and covered by the Upper and Lower Thaw Valley Special Landscape Area (SLA). It is noted that in such settlements, while there have been amendments to the identified settlement boundary (inclusion of HG4 (4) rural affordable led housing allocation) this has not affected the SLA designation in these areas. (Background Paper 45; Paragraph 1.16 refers).

The location of the small allocated site HG4(4) is nestled within the settlement of Fferm Goch. It is built up on both the northern and southern boundaries, with the main road running along the eastern boundary. There is no unacceptable harm to the SLA of the Upper and Lower Thaw valley.

The allocation of the site for residential development does not give rise to unacceptable harm to the special qualities and characteristics of the SLA, based on LANDMAP information, continues to be preserved.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3m6

4681 Object

Document Element: Between Dinas Powys, Penarth
Respondent: Mr Tim Griffiths [2578]
Summary:
Keeping all green wedge land and sticking to the proposal and not moving the goalposts to suit
Full text:
Keeping all green wedge land and sticking to the proposal and not moving the goalposts to suit
Change suggested by respondent:
-
Sound: Not specified
Attachments: None

4682 Object

Document Element: Between Barry and Rhoose;
Respondent: Mr Tim Griffiths [2578]
Summary:
All green wedge land to be kept as proposed and no moving of goalposts as and when to suit
Full text:
All green wedge land to be kept as proposed and no moving of goalposts as and when to suit
Change suggested by respondent:
-
Sound: Not specified
Attachments: None

4683 Support

Document Element: North West of Sully;
Respondent: Mr Tim Griffiths [2578]
Summary:
Keep all existing green wedge land as proposed and no moving the goalposts as and when to suit
Full text:
Keep all existing green wedge land as proposed and no moving the goalposts as and when to suit
Change suggested by respondent:
-
Sound: Not specified
Attachments: None

4892 Support

Document Element: Between Llantwit Major and

Respondent: Mrs Linda Green [1072]

Summary:

I support the allocation of this area of land to a green wedge in order to protect the rural settlement of Llanmaes from development and coalescence with the town of Llantwit Major. Clarifying the status of this land will prevent future costly battles over development of all or part of it for retail or housing and ensure Welsh planning policy with regards open countryside, protection of conservation areas, avoiding the merger of town and village and respecting the strategic growth area are upheld.

Full text:

I support the allocation of this area of land to a green wedge in order to protect the rural settlement of Llanmaes from development and coalescence with the town of Llantwit Major. Clarifying the status of this land will prevent future costly battles over development of all or part of it for retail or housing and ensure Welsh planning policy with regards open countryside, protection of conservation areas, avoiding the merger of town and village and respecting the strategic growth area are upheld.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5154 Support

Document Element: Between Llantwit Major and

Respondent: Mr Roger Drye [1614]

Summary:

It is imperative that a green wedge is created between the Llanmaes and Llantwit Major to prevent physical coalescence of the village and the town. It is vitally important to protect the conservation area from unwanted and damaging development in the very heart of the Vale of Glamorgan

Full text:

It is imperative that a green wedge is created between the Llanmaes and Llantwit Major to prevent physical coalescence of the village and the town. It is vitally important to protect the conservation area from unwanted and damaging development in the very heart of the Vale of Glamorgan

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5256 Support

Document Element: Between Llantwit Major and

Respondent: Llantwit Major Town Council (Clerk) [230]

Summary:

We note the land between Llantwit Major and Llanmaes should serve as a green wedge and the provision of retail floorspace, both of which are appropriate.

Full text:

Llantwit Major Town Council considers that the five areas identified for the development of Llantwit Major and its immediate localities are appropriate for the future development of the town. The allocation of an area between the Northern Access road and the Eglwys Brewis Road as a major land bank enables future housing developments but we question whether the infrastructure will be appropriate. The land at the former Eagleswell School site should be reserved for health and social care facilities. We note the land between Llantwit Major and Llanmaes should serve as a green wedge and the provision of retail floorspace, both of which are appropriate. We also note that Site ID 424 sits partially within the Llantwit Major boundary and is appropriate for employment

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5334 Support

Document Element: Between Llantwit Major and
Respondent: Mr Darren Green [3236]

Summary:

This Green Wedge is critical in supporting the Welsh Government planning policies around NOT coalescing Towns and Villages. This green wedge is essential in providing that separate from Llantwit Major Town and Llanmaes Village. I fully support this green wedge proposal.

Full text:

This Green Wedge is critical in supporting the Welsh Government planning policies around NOT coalescing Towns and Villages. This green wedge is essential in providing that separate from Llantwit Major Town and Llanmaes Village. I fully support this green wedge proposal.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

5355 Support

Document Element: Between Llantwit Major and
Respondent: Mr Paul Garvey [3241]

Summary:

I live in Llanmaes and three things affect us directly from the RLDP and I'd like to comment on all three, if I may.

The first is the proposed Green Wedge between Llantwit Major and Llamaes. I very much support this proposal and the Llanmaes Community Council and the vast majority, if not all of our village does too. It fits very well with the National Plans for keeping the integrity of our precious Welsh villages. It would keep Lllanmaes safe from development, as per the adopted Management plan.

Full text:

I live in Llanmaes and three things affect us directly from the RLDP and I'd like to comment on all three, if I may.

The first is the proposed Green Wedge between Llantwit Major and Llamaes. I very much support this proposal and the Llanmaes Community Council and the vast majority, if not all of our village does too. It fits very well with the National Plans for keeping the integrity of our precious Welsh villages. It would keep Lllanmaes safe from development, as per the adopted Management plan.

The second is the proposed retail development at Bridge House Farm It is the set of the proposed Lidl development which has been Called in by the Government. This is totally out of keeping with national plans.

The third is the need for flood alleviation in Llanmaes, Again, this would be much needed.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

5380 Support

Document Element: Between Llantwit Major and
Respondent: Mrs Carmel Meredith [3245]

Summary:

I support this proposal DNP2[6] for the following reasons:
Protection from intrusions into the countryside
Protects against the visual and physical coalescence between a village and a town.
Protects the setting of the Llanmaes Conservation Area as per the Management Plan.

Full text:

I support this proposal DNP2[6] for the following reasons:
Protection from intrusions into the countryside
Protects against the visual and physical coalescence between a village and a town.
Protects the setting of the Llanmaes Conservation Area as per the Management Plan.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

5402 Object

Document Element: Between Barry and Rhoose;
Respondent: Emma Reed [2653]

Summary:

Weycock Cross and land around Model Farm should be included in the Green Wedge to prevent coalition of the village of Rhoose and Barry

Full text:

Weycock Cross and land around Model Farm should be included in the Green Wedge to prevent coalition of the village of Rhoose and Barry

Change suggested by respondent:

See above

Sound: No
Attachments: None

5428 Support

Document Element: Between Llantwit Major and
Respondent: Mrs Carol Watts [3231]

Summary:

This land gives a green space between Llantwit Major and Llanmaes. If this green wedge is not kept, Llanmaes Village will become part of Llantwit Major town.

Full text:

This land gives a green space between Llantwit Major and Llanmaes. If this green wedge is not kept, Llanmaes Village will become part of Llantwit Major town.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

5432 Support

Document Element: Between Llantwit Major and
Respondent: Mr Chris Moreton [1338]

Summary:
Support this proposal to keep Llanmaes a conservation area, which is separate from Llantwit Major

Full text:
Support this proposal to keep Llanmaes a conservation area, which is separate from Llantwit Major

Change suggested by respondent:
-

Sound: Not specified
Attachments: None

5433 Support

Document Element: DNP2 – GREEN WEDGES
Respondent: Mr Chris Moreton [1338]

Summary:
Support the proposal for green wedges

Full text:
Support the proposal for green wedges

Change suggested by respondent:
-

Sound: Not specified
Attachments: None

5438 Object

Document Element: Between Barry and Rhoose;
Respondent: Mrs Susan Evans [712]

Summary:
This should be maintained as is. It should not be infringed by development near Weycock cross or at Model Farm which is proposed in other parts of the plan.

Full text:
This should be maintained as is. It should not be infringed by development near Weycock cross or at Model Farm which is proposed in other parts of the plan.

Change suggested by respondent:
-

Sound: Not specified
Attachments: None

5463 Support

Document Element: Between Llantwit Major and
Respondent: Mr Phil Tandy [1625]

Summary:

Site ID 436 Proposal Number DNP2(6).
I support the proposal that the land between the village of Llanmaes and the Llantwit Major bypass be designated as a Green Wedge and protected from development. This will avoid degradation of the countryside and help to preserve the village character of Llanmaes and its Conservation Area.

Full text:

Site ID 436 Proposal Number DNP2(6).
I support the proposal that the land between the village of Llanmaes and the Llantwit Major bypass be designated as a Green Wedge and protected from development. This will avoid degradation of the countryside and help to preserve the village character of Llanmaes and its Conservation Area.

Site ID379 Proposal Number SP12(2)
I strongly oppose the proposal for a Lidl store on this site. The proposal is incongruous with the Green Wedge, would cause significant traffic congestion in the area. It would intrude on the countryside and also be detrimental to the Llanmaes Conservation Area.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

5577 Support

Document Element: Between Llantwit Major and
Respondent: Ms Samantha Hall [1432]

Summary:

The allocation of this area as a green wedge will ensure that the village of Llanmaes remains separate from Llantwit Major supporting the principle of non-coalescence.

Full text:

The allocation of this area as a green wedge will ensure that the village of Llanmaes remains separate from Llantwit Major supporting the principle of non-coalescence.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

5601 Support

Document Element: Between Llantwit Major and
Respondent: Mrs Anneliese Moreton [3305]

Summary:

Importance of protecting our countryside and separation of towns and villages
Protects further development on green rural land

Full text:

Importance of protecting our countryside and separation of towns and villages
Protects further development on green rural land

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

5639 Support

Document Element: Between Llantwit Major and
Respondent: Mr Derek Massey [3323]

Summary:

I strongly SUPPORT the proposal of this green wedge as this will protect against the visual and physical coalescence of the Town of Llantwit Major crossing the B4265 bypass road and creeping towards the Conservation Area of Llanmaes Village.

Full text:

I strongly SUPPORT the proposal of this green wedge as this will protect against the visual and physical coalescence of the Town of Llantwit Major crossing the B4265 bypass road and creeping towards the Conservation Area of Llanmaes Village.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

5655 Support

Document Element: Between Llantwit Major and
Respondent: Mr Eamonn McGreevy [3326]

Summary:

1) Protection from intrusions into the countryside.
2) Protects against the visual and physical coalescence of Llantwit Major and Llanmaes.
3) Protects the setting of the Llanmaes Conservation Area as per the adopted Management Plan.

Full text:

1) Protection from intrusions into the countryside.
2) Protects against the visual and physical coalescence of Llantwit Major and Llanmaes.
30 Protects the setting of the Llanmaes Conservation Area as per the adopted Management Plan.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

5679 Support

Document Element: Between Llantwit Major and
Respondent: Mrs Laura McGreevy [3330]

Summary:

Re: Green Wedges:
I SUPPORT the proposal that the land between Llanmaes village and Llantwit Major be designated as a Green Wedge and protected from development for the following reasons:
1) It will provide protection from intrusions into the countryside.
2) It will protect against the visual and physical coalescence of Llantwit Major and Llanmaes.
3) It will protect the setting of the Llanmaes Conservation Area as per the adopted Management Plan.

Full text:

Re: Green Wedges:
I SUPPORT the proposal that the land between Llanmaes village and Llantwit Major be designated as a Green Wedge and protected from development for the following reasons:
1) It will provide protection from intrusions into the countryside.
2) It will protect against the visual and physical coalescence of Llantwit Major and Llanmaes.
3) It will protect the setting of the Llanmaes Conservation Area as per the adopted Management Plan.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

5683 Support

Document Element: Between Llantwit Major and

Respondent: Mr Keith Lewis [2288]

Summary:

I am writing to State that I whole-heartedly support the above referenced proposal for the Green Wedge.

This wedge effectively separates Llantwit Major and Llanmaes in accordance with existing Planning Rules, preventing coalescence of Town and Village, protecting the existing Llanmaes Conservation Area and preventing an already busy junction from becoming a dangerous one.

Full text:

I am writing to State that I whole-heartedly support the above referenced proposal for the Green Wedge.

This wedge effectively separates Llantwit Major and Llanmaes in accordance with existing Planning Rules, preventing coalescence of Town and Village, protecting the existing Llanmaes Conservation Area and preventing an already busy junction from becoming a dangerous one.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/t4c

5690 Support

Document Element: Between Llantwit Major and

Respondent: Ms Ann Barnaby [1702]

Summary:

Totally in support of green wedges in particular the proposed new area at Llantwit Major/Llanmaes LM1 much of this site is a low valley sloping down to Llanmaes brook which is a rich and diverse wildlife corridor proven during many surveys to contain Otters amongst many others. Any development in this area would cause a coalescence of the settlements.

I am also in support of B1 Boverton being classed a green wedge.

Full text:

Totally in support of green wedges in particular the proposed new area at Llantwit Major/Llanmaes LM1 much of this site is a low valley sloping down to Llanmaes brook which is a rich and diverse wildlife corridor proven during many surveys to contain Otters amongst many others. Any development in this area would cause a coalescence of the settlements.

I am also in support of B1 Boverton being classed a green wedge.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5725 Object

Document Element: DNP2 – GREEN WEDGES

Respondent: Mr David Entwistle [3264]

Summary:

The protection and boundaries of these green wedge areas is currently too weak and open to change too easily such as the change proposed to accommodate housing at the North West Barry site. The boundary at the North West Barry site has been changed simply to allow for easier development of housing. It seems the council is caving to panic around the need for new housing. There has been no other change to the environment or urban growth of the area. This is not an acceptable reason to change the boundaries.

Full text:

The protection and boundaries of these green wedge areas is currently too weak and open to change too easily such as the change proposed to accommodate housing at the North West Barry site. The boundary at the North West Barry site has been changed simply to allow for easier development of housing. It seems the council is caving to panic around the need for new housing. There has been no other change to the environment or urban growth of the area. This is not an acceptable reason to change the boundaries.

Change suggested by respondent:

The green wedges need greater protection and movement of the boundaries should only be considered as an absolute last resort. The boundaries and green wedges should only be moved after considerable public consultation and other avenues for development have been tried.

Sound: No

Attachments: None

5727 Object

Document Element: Between Barry and Rhoose;

Respondent: Mr David Entwistle [3264]

Summary:

The boundary of the green wedge has been changed here for this proposed LDP. It seems the council is caving to pressure and panic in order to develop new housing and altering boundaries and seeking to develop into green wedges as an easy solution. This is not acceptable. These boundaries such as surrounding the proposed North West Barry housing development site are being moved against the majority wishes of Vale residents.

Full text:

The boundary of the green wedge has been changed here for this proposed LDP. It seems the council is caving to pressure and panic in order to develop new housing and altering boundaries and seeking to develop into green wedges as an easy solution. This is not acceptable. These boundaries such as surrounding the proposed North West Barry housing development site are being moved against the majority wishes of Vale residents.

Change suggested by respondent:

Boundary and green wedge movements should only be an absolute last resort. Stronger protections should be in place for them and movement/development should only be allowed to occur after all other avenues have been exhausted and considerable public consultation. Development of new housing cannot be at the expense of green wedges and green space. A clause preventing an ultimate growth at all costs policy should be in place.

Sound: No

Attachments: None

5731 Support

Document Element: Between Llantwit Major and

Respondent: Mr Graeme Smith [3029]

Summary:

I strongly support designating this area as a Green Wedge in the RLDP Deposit Plan to prevent urban encroachment and protect the visual and physical separation of Llantwit Major and Llanmaes, including the Llanmaes Conservation Area. This green space faces significant development pressure, evidenced by recent housing, mixed-use, and retail proposals. The area scores highest among all Green Wedges in the Vale of Glamorgan, meeting the Welsh Government's designation purposes. I appreciate the RLDP team's positive evaluation and have no objections to most of the area's proposed boundaries, except for the tentative retail site.

Full text:

I strongly support this allocation within the RLDP Deposit Plan. This designation protects this area of open countryside against intrusions from the urban form. It also protects against the visual and physical coalescence of the Town of Llantwit Major and the Village of Llanmaes and protects the setting of the Llanmaes Conservation Area consistent with its adopted Management Plan. Development pressure on this strip of green space is significant as evidenced by the various housing, mixed and retail proposals made to date as part of the RLDP process. Having studied the background papers on the allocation of Green Wedges throughout the Vale of Glamorgan I note that this area scores the highest of all the Green Wedges across the county, including the five existing ones, as recorded in RLDP Background Paper 27 and tested against the Welsh Government's five purposes for designation of a Green Wedge. I am most grateful to the RLDP team for their positive evaluation of this site for this classification. I also note the adjustments made to the area covered by the Green Wedge between that originally proposed by and that in the Deposit Plan and with the exception of the tentative retail designation of the Bridge House Farm parcel have no objections to these.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5737 Support

Document Element: Between Llantwit Major and

Respondent: Mrs Linda Green [1072]

Summary:

The granting of a green wedge in this open countryside between Llanmaes and Llantwit Major will help prevent ongoing development proposals which, if granted, would contradict Welsh planning policy and result in not only the loss of open countryside but the joining of town and village (which will fall under two separate boundaries with regards local council), impact the conservation area result in ongoing pressure for furtehr retail development along this strip of land. The criteria appear well met in order to support this proposal.

Full text:

The granting of a green wedge in this open countryside between Llanmaes and Llantwit Major will help prevent ongoing development proposals which, if granted, would contradict Welsh planning policy and result in not only the loss of open countryside but the joining of town and village (which will fall under two separate boundaries with regards local council), impact the conservation area result in ongoing pressure for furtehr retail development along this strip of land. The criteria appear well met in order to support this proposal.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5751 Support

Document Element: Between Llantwit Major and

Respondent: Mrs Jacqueline Wright [3349]

Summary:

I SUPPORT THIS PROPOSAL IN THE HOPE THE LAND WILL BE PROTECTED FROM FUTURE DEVELOPMENT. IT WILL OFFER PROTECTION FROM INTRUSIONS INTO THE COUNTRYSIDE, IT WILL ALSO PROTECT AGAINST THE VISUAL AND PHYSICAL COALESCENCE OF A TOWN AND VILLAGE, IT WILL PROTECT THE SETTING OF THE LLANMAES CONSERVATION AREA AS PER THE ADOPTED MANAGEMENT PLAN

Full text:

I SUPPORT THIS PROPOSAL IN THE HOPE THE LAND WILL BE PROTECTED FROM FUTURE DEVELOPMENT. IT WILL OFFER PROTECTION FROM INTRUSIONS INTO THE COUNTRYSIDE, IT WILL ALSO PROTECT AGAINST THE VISUAL AND PHYSICAL COALESCENCE OF A TOWN AND VILLAGE, IT WILL PROTECT THE SETTING OF THE LLANMAES CONSERVATION AREA AS PER THE ADOPTED MANAGEMENT PLAN

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5767 Support

Document Element: Between Llantwit Major and

Respondent: Rik Stevens [3360]

Summary:

I would like to express my support for the proposal to designate the land between the Village of Llanmaes and the Llantwit Major Bypass as a Green Wedge. Maintaining this land as protected open space is important in order to:
- Prevent the visual and physical coalescence of Llantwit Major and Llanmaes
- Protect the rural setting and landscape character of the area
- Preserve the setting of the Llanmaes Conservation Area
- Safeguard countryside from incremental development pressures

Designating this land as a Green Wedge is a sensible and necessary planning measure to ensure the long-term separation and identity of the two settlements and to maintain the character of the surrounding countryside.

Full text:

I am writing in response to the Replacement Local Development Plan (RLDP) consultation regarding proposals affecting Llanmaes.

Green Wedge – Land between Llantwit Major and Llanmaes Site ID 436 – Proposal Number DNP2(6)

I would like to express my support for the proposal to designate the land between the Village of Llanmaes and the Llantwit Major Bypass as a Green Wedge. Maintaining this land as protected open space is important in order to:

- Prevent the visual and physical coalescence of Llantwit Major and Llanmaes
- Protect the rural setting and landscape character of the area
- Preserve the setting of the Llanmaes Conservation Area
- Safeguard countryside from incremental development pressures

Designating this land as a Green Wedge is a sensible and necessary planning measure to ensure the long-term separation and identity of the two settlements and to maintain the character of the surrounding countryside.

Retail Development – Bridge House Farm
Site ID 379 – Proposal Number SP12(2)

I would like to register my objection to the proposed retail development at Bridge House Farm.

The proposed store would represent a significant and inappropriate intrusion into the countryside and would undermine the purpose of the proposed Green Wedge. In particular:

- The development would contribute to the visual and physical coalescence of Llantwit Major and Llanmaes.
- It would introduce a large-scale retail building and associated infrastructure into a sensitive rural setting.
- The proposal would be incongruous with the landscape character of the area and detrimental to the setting of the Llanmaes Conservation Area.
- The site lies outside the defined Strategic Growth Area, making it an unsuitable location for this type of development.

For these reasons I strongly urge the Council to reject the allocation of this site for retail development.

Thank you for considering these comments as part of the consultation process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representations - Redacted - https://valeofglamorgan.oc2.uk/a/t5j

5778 Support

Document Element: Between Llantwit Major and

Respondent: Mrs Sue Stevens [2287]

Summary:

I support the designation of the Green Wedge between Llanmaes and Llantwit Major (Site ID 436 – Proposal DNP2(6)). Protecting this land is important to prevent the visual and physical coalescence of the two settlements, maintain the rural character of the area, and preserve the setting of the Llanmaes Conservation Area.

Full text:

I support the designation of the Green Wedge between Llanmaes and Llantwit Major (Site ID 436 – Proposal DNP2(6)). Protecting this land is important to prevent the visual and physical coalescence of the two settlements, maintain the rural character of the area, and preserve the setting of the Llanmaes Conservation Area.

I object to the proposed retail development at Bridge House Farm (Site ID 379 – Proposal SP12(2)). The scale and nature of the development would represent a significant intrusion into the countryside, contribute to the merging of Llantwit Major and Llanmaes, and be harmful to the landscape and the setting of the Llanmaes Conservation Area. The site is also outside the RLDP's defined Strategic Growth Area.

For these reasons I urge the Council to support the Green Wedge designation and reject the retail allocation at Bridge House Farm.

Change suggested by respondent:

Keep designation.

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/t6v

5782 Support

Document Element: Between Llantwit Major and

Respondent: Mrs Gail kirkham [1596]

Summary:

A green wedge between Llantwit Major and Llanmaes is of the utmost importance.it would prevent unsuitable development, like the disputed Lidl supermarket proposal, if it was strictly adhered to by councillors as well as officers, who have done their best to protect Llanmaes from opportunistic decisions by ill informed elected members.

Full text:

A green wedge between Llantwit Major and Llanmaes is of the utmost importance.it would prevent unsuitable development, like the disputed Lidl supermarket proposal, if it was strictly adhered to by councillors as well as officers, who have done their best to protect Llanmaes from opportunistic decisions by ill informed elected members.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5787 Support

Document Element: Between Llantwit Major and

Respondent: Mrs Gail kirkham [1596]

Summary:

Please see my earlier comment. Green wedge between Llantwit Major and Llanmaes absolutely essential as is education for elected members to prevent them riding roughshod over council policies in a shift attempt to curry favour with certain Llantwit Najor residents.

Full text:

Please see my earlier comment. Green wedge between Llantwit Major and Llanmaes absolutely essential as is education for elected members to prevent them riding roughshod over council policies in a shift attempt to curry favour with certain Llantwit Najor residents.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5808 Support

Document Element: Between Barry and Rhoose;

Respondent: Mrs Catherine Hart [879]

Summary:

I strongly support the maintenance of the green wedge between Barry and Rhoose. This avoids urban coalescence and is crucial to the local biodiversity and identity of the two places.

Full text:

I strongly support the maintenance of the green wedge between Barry and Rhoose. This avoids urban coalescence and is crucial to the local biodiversity and identity of the two places.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5828 Support

Document Element: Between Llantwit Major and

Respondent: Mrs Julie Massey [3390]

Summary:

I fully support the proposal of the green wedge North of the B4265 as this will protect against the visual and physical coalescence of the Town of Llantwit Major merging over the bypass road and creeping towards the protected Conservation Area of Llanmaes Village.

Full text:

I fully support the proposal of the green wedge North of the B4265 as this will protect against the visual and physical coalescence of the Town of Llantwit Major merging over the bypass road and creeping towards the protected Conservation Area of Llanmaes Village.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5924 Support

Document Element: Between Llantwit Major and

Respondent: Mrs Caroline Smith [3388]

Summary:

I strongly support this designation as it will
a) protect the visual and physical separation of urban town and rural village,
b) avoid further loss of rural open landscape and agricultural amenity as it is currently under pressure from proposals to build a retail site on the land,
c) protect the biodiversity of the area within and beyond this parcel of land.
This wedge identification scores a maximum for green wedge criteria as outlined by the Welsh Government. I support all appropriate aspects of the boundaries assigned by the RLDP except for the tentative retail site.

Full text:

I strongly support this designation as it will
a) protect the visual and physical separation of urban town and rural village,
b) avoid further loss of rural open landscape and agricultural amenity as it is currently under pressure from proposals to build a retail site on the land,
c) protect the biodiversity of the area within and beyond this parcel of land.
This wedge identification scores a maximum for green wedge criteria as outlined by the Welsh Government. I support all appropriate aspects of the boundaries assigned by the RLDP except for the tentative retail site.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5937 Object

Document Element: Between Barry and Rhoose;

Respondent: Mr William Hart [1009]

Summary:

There is already a green wedge but the council has decided to develop it, which means they are worthless.

Full text:

There is already a green wedge but the council has decided to develop it, which means they are worthless.

Change suggested by respondent:

Green Wedges should be permanent and all developments should be made around them.

Sound: No

Attachments: None

5938 Support

Document Element: Between Llantwit Major and

Respondent: Mrs Susan Tandy [1626]

Summary:

Conservation/Green Wedge Site ID 436. Proposal Number DNP2(6)
I fully support the adoption of this site as a green wedge between Llantwit and Llanmaes, in order to protect this area of rural land against urban encroachment and to prevent coalescence between the town of Llantwit ad the village of Llanmaes.

Full text:

Conservation/Green Wedge Site ID 436. Proposal Number DNP2(6)
I fully support the adoption of this site as a green wedge between Llantwit and Llanmaes, in order to protect this area of rural land against urban encroachment and to prevent coalescence between the town of Llantwit ad the village of Llanmaes.
Retail - Land at Bridge House Farm Site ID 379, Proposal Number SP12 (2)
I completely disagree that this land should be used for retail purposes, because such a retail development would result in the very coalescence the community council seeks to prevent and would be out of keeping within the proposed green wedge.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/t9f

5947 Support

Document Element: Between Llantwit Major and

Respondent: Mrs Janet Harris [1846]

Summary:

I would strongly support the proposal for a 'green wedge' for the land between the village of Llanmaes and the Llantwit major bypass, but this should also include the land currently under proposal for the above retail development site. This would protect this land from further hostile development proposals, protect the intrusion into the countryside and the setting of the Llanmaes Conservation Area and protect the village against physical and visual coalescence with a town, protecting its rural and village character. It would protect the setting of the Llanmaes Conservation Area as per the adopted Management Plan.

Full text:

As a resident of the village of Llanmaes for the last 37 years, I would like to make the following comments:
Flood Alleviation
There is a desperate need for not just a flood alleviation plan, but action to protect the residents of Llanmaes from the continuing effects of flooding in the area. More properties have been affected this year. Recently our own 400-year-old property, which has never been previously affected was subjected to a backlog of sewage from the main sewer in the road on which we live. Fortunately, a manhole on our drive gave way under the pressure, releasing water and sewage down the road. Otherwise, like other properties in the village we would be at risk of the property itself flooding with sewage.
I would call upon both the Vale of Glamorgan Council and the Welsh Government to come up with a coherent, joined up plan and solution to this long running problem and implement it with urgency.
No building should be allowed in the village until a solution has been completed, there is too much risk to existing properties.
Retail - Land at Bridge Farm House site ID 379 Proposal Number SP12(2)
This proposed development, currently subject to a 'Call In' by the Welsh government is at clashing odds with the village and rural community setting of Llanmaes. The large store and supporting structures and developments would be significant intrusions into the countryside and would result in the physical and visual coalescence of a small rural village with the town of Llantwit Major. It represents a significant intrusion into the countryside, is at odds with the proposal of a green wedge to protect the rural setting of the village and would be clearly detrimental to the Llanmaes Conservation Area. It is outside the RLDP's Strategic Growth Area.
Green Wedge/Conservation. Land Between Llantwit Major and Llanmaes Site D436 Proposal Number DNP2(6)
I would strongly support the proposal for a 'green wedge' for the land between the village of Llanmaes and the Llantwit major bypass, but this should also include the land currently under proposal for the above retail development site. This would protect this land from further hostile development proposals, protect the intrusion into the countryside and the setting of the Llanmaes Conservation Area and protect the village against physical and visual coalescence with a town, protecting its rural and village character. It would protect the setting of the Llanmaes Conservation Area as per the adopted Management Plan.
I would be grateful if these comments could be duly noted and considered.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/t9p

5951 Support

Document Element: Between Llantwit Major and

Respondent: Mr Richard Cobourne [3440]

Summary:

I support the proposal for a green wedge conservation area protecting it from development.

Full text:

I understand that the Draft Plan for the RLDP is now open for consultation. I would be grateful if my comments below would be included please.

Site ID 436 — Proposal Number DNP2(6)
Conservation / Green Wedge
I support the proposal for a green wedge conservation area protecting it from development.

Site ID 379 — Proposal Number SP12(2)
Retail — land at Bridge House Farm
My main concern is for the survival of the town of Llantwit Major and its small owner-managed shops, Post Office, chemists, charity shops, hairdressers, etc. And to some extent existing supermarkets. I am also concerned about maintaining green spaces and conservation areas as per the adopted Management Plan.
Building an 'out of town' supermarket will significantly and detrimentally affect footfall to the town centre — people who use the current town centre retail and hospitality opportunities simply will not visit as they will be parked away from them and will not return. The town will slowly die. Shops and other premises will be boarded up. Livelihoods will be lost. Time-and-again we have seen many towns across Wales and the rest of the UK suffer. Simple desk-based research will reveal many.
Taking one town as an example — Chepstow. Tesco built a supermarket about 150 metres from Chepstow high street across a main road — not dissimilar to the situation in Llantwit Major / Llanmaes. Few now visit Chepstow high street so the town itself is dying. Shops and other premises have closed, remaining empty for years — and at a time when retail outlets are increasingly under pressure from on-line shopping.
The council and planners must do everything it can to ensure that Llantwit Major remains a vibrant and varying environment for generations to come — providing employment and facilities for all to enjoy.
Building out-of-town will destroy the community of Llantwit Major for ever.
Housing — land to the south of Millands Farm etc.

HG1(5), HG2(21) and HG2(3)
I am silent on this proposal

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/t9q

5991 Support

Document Element: Between Llantwit Major and

Respondent: Mr & Mrs Alison and Richard Leach [2143]

Summary:

I attended the consultation at CF61 about the RLDP and was advised to write to you with my comments. I was pleased to see that in the RLDP that the fields adjacent to the LLantwit Major Bypass (site ID 436 Proposal number DN2(6) is designated as a Green wedge That application was made by our Community council and I fully support this proposal. the reasons they gave and I agree with this , are that protection of the open country side, protects against the coalescence of the town and our rural village, and protects the setting of the conservation area, which I live in.

Full text:

I attended the consultation at CF61 about the RLDP and was advised to write to you with my comments. I was pleased to see that in the RLDP that the fields adjacent to the LLantwit Major Bypass (site ID 436 Proposal number DN2(6) is designated as a Green wedge That application was made by our Community council and I fully support this proposal. the reasons they gave and I agree with this , are that protection of the open country side, protects against the coalescence of the town and our rural village, and protects the setting of the conservation area, which I live in.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3xk

6064 Support

Document Element: Between Llantwit Major and

Respondent: Mr Philip Taylor [3439]

Summary:

It is important to support villages and towns with the correct level of development. Green Wedges will help protect their identities and give protection to where development should not occur.

Full text:

It is important to support villages and towns with the correct level of development. Green Wedges will help protect their identities and give protection to where development should not occur.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6070 Support

Document Element: Between Llantwit Major and

Respondent: Andrew Jack [3465]

Summary:

I support Proposal Number ID 436 Number DNP2 (6), for the Conservation /Green Wedge to prevent the coalescence of Llanmaes and Llantwit Major and hence preserve the unique village amenity of the Llanmaes setting which is enjoyed by residents of both locations and the many walkers, runners and cyclists who daily frequent the village and adjoining countryside.

Full text:

I wish to oppose RLDP ID 379 Proposal Number SP12(2), on the grounds of the position and proposed access road to and from this Lidle development will be a major safety concern and danger both to the traffic through the village of Llanmaes and to the traffic on the Llantwit Major bypass B-4265. The current Llanmaes village traffic consists of mainly light vehicles and some HGV, whilst the B-4265 is increasingly HGV, supplying quarried materials to Aberthaw Cement works. Both roads are used extensively by cyclists particularly through the village since this is the recognised Vale cycleway to Ewenny. The single footpath through the village to the traffic light controlled crossings is more importantly the main route used by pedestrians both residents and visitors, including local school children going to and from the schools in Llantwit Major, plus many runners and walkers from the larger recreational areas. In addition there are stables and a riding school just before the exit of the village with the junction with the B-4265. I am of the opinion that as indicated on the Lidl proposal it will only be a matter of time before serious accidents, injuries and fatalities will occur.

Additionally I support Proposal Number ID 436 Number DNP2 (6), for the Conservation /Green Wedge to prevent the coalescence of Llanmaes and Llantwit Major and hence preserve the unique village amenity of the Llanmaes setting which is enjoyed by residents of both locations and the many walkers,runners and cyclists who daily frequent the village and adjoining countryside.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation - Redacted - https://valeofglamorgan.oc2.uk/a/3t4

6100 Comment

Document Element: Between Llantwit Major and

Respondent: Richard Hughes [3475]

Summary:

All of the land between the village of Llanmaes and the Llantwit Major by-pass should be dedicated to a Green Wedge and thus exempted from any development. It is important to resist a coalescence between town and village. Any single development would undermine the principle of countryside protection and provide a precedent for further intrusions. The Llanmaes Conservation area should be protected. I understand that, at present, the site of the proposed retail development is unprotected, pending the outcome of the Inquiry. Granting permission for the store to be developed would undermine, render pointless the idea of coalescence-avoidance and countryside protection.

Full text:

I would like to submit comments with regard to the consultation process on the Deposit (Draft) Plan for the RLDP.

Conservation/ Green Wedge. Site ID 436 Proposal Number DNP2(6)

All of the land between the village of Llanmaes and the Llantwit Major by-pass should be dedicated to a Green Wedge and thus exempted from any development. It is important to resist a coalescence between town and village. Any single development would undermine the principle of countryside protection and provide a precedent for further intrusions. The Llanmaes Conservation area should be protected. I understand that, at present, the site of the proposed retail development is unprotected, pending the outcome of the Inquiry. Granting permission for the store to be developed would undermine, render pointless the idea of coalescence-avoidance and countryside protection.

Retail - Land at Bridge House Farm Site ID 379 Proposal Number SP12(2)

The proposed Lidll development should be rejected for the following reasons:

It would introduce a coalescence of town and Village, an action that goes against present policy. The coalescing effect would be accentuated by the increased traffic, the increase in visitors and the negative effects such as littering that would accompany greater human presence.

It would be situated outside the RDLP's defined Strategic Growth Area.

It would mark a major intrusion into the countryside, visually and in terms of human movement.

It may be the case that, especially with prospect of 500 houses to be built near St Athan, that an additional supermarket might be necessary to meet the needs of the growing population. It doesn't make more sense to site the development in Green Wedge land, on a difficult corner, resulting in an inevitable increase in traffic, a loss of countryside and adding a visual plight to the local perspective.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/td4

6120 Object

Document Element: Between Barry and Rhoose;

Respondent: Nadia Cooper [3478]

Summary:

The Technical Briefing Note misinterprets PPW by reducing green wedge policy to a distance test. The 2015 Inspector found this land integral to openness and separation. The site remains visually exposed, contributes to the rural setting of Barry and forms part of a continuous landscape corridor. The case for moving the GW boundary is weak and would set a damaging precedent.

Full text:

The Technical Briefing Note misinterprets PPW by reducing green wedge policy to a distance test. The 2015 Inspector found this land integral to openness and separation. The site remains visually exposed, contributes to the rural setting of Barry and forms part of a continuous landscape corridor. The case for moving the GW boundary is weak and would set a damaging precedent.

Change suggested by respondent:

The plan should be scrapped altogether

Sound: No

Attachments: None

6130 Comment

Document Element: Between Llantwit Major and

Respondent: Ms Ann Barnaby [1702]

Summary:

I have already commented on this site under the 'green wedge' proposal which I support.

Full text:

I have already commented on this site under the 'green wedge' proposal which I support.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6148 Comment

Document Element: Between Barry and Rhoose;

Respondent: Mrs Jacky Williams [3343]

Summary:

The proposed development of the land to the South of Port Road West (Model Farm) reduces the 'green wedge' between Rhoose and Barry, in addition to reducing land available for wildlife and biodiversity. I note that, in document BP27, reference to 'amending the boundary', should it be required, when considering the proposed housing development in North West Barry and it remains to be seen how large or small the 'green wedge' will end up being and how, in effect, Barry will merge into Rhoose when more developments will be proposed in the future.

Full text:

The proposed development of the land to the South of Port Road West (Model Farm) reduces the 'green wedge' between Rhoose and Barry, in addition to reducing land available for wildlife and biodiversity. I note that, in document BP27, reference to 'amending the boundary', should it be required, when considering the proposed housing development in North West Barry and it remains to be seen how large or small the 'green wedge' will end up being and how, in effect, Barry will merge into Rhoose when more developments will be proposed in the future.

Change suggested by respondent:

I think that Planning permission for the development of Model Farm should not be granted.

Sound: No

Attachments: None

6188 Comment

Document Element: DNP2 – GREEN WEDGES

Respondent: Ms Lucie Taylor [2506]

Summary:

SF&G recognise the importance of green wedges and other countryside land, for food production and suggest safeguarding land accordingly, aligned with housing growth. Our communities face challenges like poor health, climate change, and inequality, with a fragile food system vulnerable to shocks. The Welsh Government Community Food Strategy (2025) aims to develop diverse local food networks. Supportive policies are needed for small-scale horticultural farms to enable essential infrastructure, moving away from strict scrutiny and towards recognising genuinely necessary structures for agriculture, ensuring resilient and sustainable local food businesses.

Full text:

Green wedges are particular opportunities to encourage food production and this should be mentioned under this policy. We can use green wedge land and land that has high agricultural value to more specifically safeguard land for food growing – perhaps commensurate to the level of housing growth in a region, city, town or village.
The levels of housing growth referred to in the RLDP requires land outside settlements - in green wedge and other countryside locations to be protected for food production which will happen alongside the growth.
Our communities are facing many challenges - poor health, climate change, nature loss, disconnection and loneliness, and the cost of living. These intensifying pressures are straining communities and deepening inequality. Our food system is very fragile. The ground-breaking report last year by Tim Lang, Just in Case: narrowing the UK civil food resilience gap, shows how our highly centralised just-in-time food distribution system, on which we are wholly dependent, is not resilient to shocks that we already see happening - cyber-attacks, closed ports, global conflict, extreme climate events. The launch of the Community Food Strategy in 2025, saw a Welsh Government commitment to deliver representative, diverse and active local food networks working to increase the number of collaborative community food projects. Their commitment is long term and whole system. There is now a national realisation that infrastructure change is needed and that joined up thinking and policy support is the core foundation to that. Horticultural food production often happens on small areas of land where farmers benefit from little permitted development rights. they need supportive policy for their often absolutely essential infrastructure that allow food growing initiatives to thrive. We must move away from the old-fashioned approach of stricter scrutiny and regard such structures as ‘genuinely necessary’ for the purposes of agriculture, if reasonable and proportionate information is provided to support their need.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6200 Support

Document Element: Between Llantwit Major and

Respondent: Mr Colin Arnold [2871]

Summary:

I believe that this proposal is necessary to ensure that there is not 'urban creep' of Llantwit Major into the rural vale. Llanmaes is a separate community and whilst currently part of the Llantwit Major electoral organisation will not be in the future. Llanmaes is a rual community with agricultural traffic and regular horse movements through the village and joining onto Llantwit Major would have a significant detrimental effect on the village. This green wedge would protect the setting of the Llanmaes Conservation Area.

Full text:

I believe that this proposal is necessary to ensure that there is not 'urban creep' of Llantwit Major into the rural vale. Llanmaes is a separate community and whilst currently part of the Llantwit Major electoral organisation will not be in the future. Llanmaes is a rual community with agricultural traffic and regular horse movements through the village and joining onto Llantwit Major would have a significant detrimental effect on the village. This gree wedge would protect the setting of the Llanmaes Conservation Area.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6224 Support

Document Element: Between Llantwit Major and

Respondent: Mrs Jan Arnold [3499]

Summary:

I support this proposal because I don't want Llanmaes and Llantwit Major to become one amorphous mass. Llanmaes is a rural village and should be kept that way. It also protects the Llanmaes conservation area.

Full text:

I support this proposal because I don't want Llanmaes and Llantwit Major to become one amorphous mass. Llanmaes is a rural village and should be kept that way. It also protects the Llanmaes conservation area.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6256 Support

Document Element: Between Llantwit Major and

Respondent: Mr Noel Harris [2148]

Summary:

I would strongly support the proposal for a 'green wedge' for the land between the village of Llanmaes and the Llantwit major bypass, but this should also include the land currently under proposal for the above retail development site. This would protect this land from further hostile development proposals, protect the intrusion into the countryside and the setting of the Llanmaes Conservation Area and protect the village against physical and visual coalescence with a town, protecting its rural and village character. It would protect the setting of the Llanmaes Conservation Area as per the adopted Management Plan.

Full text:

Green Wedge/Conservation. Land Between Llantwit Major and Llanmaes Site D436 Proposal Number DNP2(6)
I would strongly support the proposal for a 'green wedge' for the land between the village of Llanmaes and the Llantwit major bypass, but this should also include the land currently under proposal for the above retail development site. This would protect this land from further hostile development proposals, protect the intrusion into the countryside and the setting of the Llanmaes Conservation Area and protect the village against physical and visual coalescence with a town, protecting its rural and village character. It would protect the setting of the Llanmaes Conservation Area as per the adopted Management Plan.
Flood Alleviation
There is a desperate need for not just a flood alleviation plan, but action to protect the residents of Llanmaes from the continuing effects of flooding in the area. More properties have been affected this year. Recently our own 400-year-old property, which has never been previously affected, was subjected to a backlog of sewage from the main sewer in the road on which we live. Fortunately, a manhole on our drive gave way under the pressure, releasing water and sewage down the road. Otherwise, like other properties in the village we would be at risk of the property itself flooding with sewage.
I would call upon both the Vale of Glamorgan Council and the Welsh Government to come up with a coherent, joined up plan and solution to this long running problem and implement it with urgency.
No building should be allowed in the village until a solution has been completed, there is too much risk to existing properties.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3j5

6266 Support

Document Element: Between Llantwit Major and

Respondent: Mrs Bethan Pocock [3268]

Summary:

I support establishing a Green Wedge between Llantwit Major and Llanmaes to protect Llanmaes' rural character, historic sites, and listed buildings. The Green Wedge will prevent coalescence with Llantwit Major and preserve Llanmaes as a small, thriving village with agricultural roots. It is accessed via narrow lanes used by pedestrians, cyclists, horse riders, and agricultural traffic. This measure aligns with the Boundary Commission's proposed changes and aims to maintain Llanmaes as part of a network of small villages.

Full text:

Conservation /Green Wedge - land between Llantwit Major and Llanmaes Ste ID 436 Proposal Number DNP (6)
In order to preserve the conservation status of Llanmaes as a small rural village community with agriculture as its mainstay, including a Church dating back to 1234, ancient ruins, listed dwellings, the setting up of this Green Wedge is essential. It will also ensure there is no risk of coalescence betwee Llanmaes and the nearby small town of Llantwit Major.
Llanmaes is a small , but thriving community accessed from Siggingston, St Mary Church, St Athan, Eglwys Brewis, and indeed Llantwit Major by a network of narrow unclassed lanes. These are enjoyed by walkers, horse riders, cyclists and of course shared by motor vehicles, incuding numerous working agricultural traffic. The proposed Green Wedge would serve to conserve this village as part of a network of small villages , which it is important to preserve, and is of particuar relevance as Llanmaes will form part of a group of villages as part of the Boundary Commission's recommended changes.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3kb

6291 Support

Document Element: Between Llantwit Major and

Respondent: Robert Turner [3525]

Summary:

The land between the Village of Llanmaes and the Llantwit Major Bypass should be designated as Green Wedge , us villages don't won't Llantwit Major joining our village.
Protects the conservation area as previously mentioned by CADW.
and should restrict building work of any description as this should remain Greenfields for the beauty on views of our countryside and Historical Church.

Full text:

Hi, The land between the Village of Llanmaes and the Llantwit Major Bypass should be designated as Green Wedge , us villages don't won't Llantwit Major joining our village . Protects the conservation area as previously mentioned by CADW .and should restrict building work of any description as this should remain Greenfields for the beauty on views of our countryside and Historical Church .
Resident of Llanmaes :-

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/tf9

6309 Support

Document Element: Between Llantwit Major and

Respondent: Eve Turner [3535]

Summary:

A Green wedge area should be designated between Llanmaes and Llantwit Major bypass, Which would protect the Llanmaes conservation area & also Protect our Countryside .

Full text:

A Green wedge area should be designated between Llanmaes and Llantwit Major bypass, Which would protect the Llanmaes conservation area & also Protect our Countryside .

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Representation - https://valeofglamorgan.oc2.uk/a/3mf

6332 Support

Document Element: Between Llantwit Major and

Respondent: Richard Leach [3544]

Summary:

I was pleased to see that in the RLDP that the fields adjacent to the LLantwit Major Bypass (site ID 436 Proposal number DN2(6)) is designated as a Green wedge. That application was made by our Community council and I fully support this proposal. The reasons they gave and I agree with this, are the protection of the open country side, protects against the coalescence of the town and our rural village, and protects the setting of the conservation area.

Full text:

I attended the consultation at CF61 about the RLDP and was advised to write to you with my comments.

I was pleased to see that in the RLDP that the fields adjacent to the LLantwit Major Bypass (site ID 436 Proposal number DN2(6) is designated as a Green wedge That application was made by our Community council and I fully support this proposal. the reasons they gave and I agree with this , are that protection of the open country side, protects against the coalescence of the town and our rural village, and protects the setting of the conservation area.

I see that the Planning policy has ring fenced the location of the proposed Lidl development (ID 379 Proposal number SP12(2) that is currently called in by the Welsh government . You will be aware that the Planning committee voted against the recommendation of the planning officer. when they made there decision, that is now being challenged as procedurally against a lot of Vale and Welsh Government policies. Looking forward to this site being included in the green wedge when this ridicules decision is over turned

I note with interest that several fields to the north east of Llanmaes have been designated as potential solar farm sites. These very fields are partially responsible for the flooding risk in Llanmaes. I suspect that solar farms would not help this problem.

The deferred flood alleviation scheme for Llanmaes affected our land in Siginstone lane. The RLDP mentions this scheme several times but no response has been forth coming. The village floods and for many many years The council and the Welsh government have put in funding in 2023, the Welsh government allocated £3,090,855 and in 24/25 £16,000 to solve this. Nothing has yet happened, indeed in the RLDP it is mentioned extensively that the village floods but we cannot see what specific directions have been made to resolve this problem. I urge the Vale council to liaise with the Welsh government about bringing this forward and mention in the deposit plan.
I appreciate that the costs of the plan increased substantially with the fuel costs of the Ukraine war and probable is increasing again. however parts of the plan , reprofiling the road and channeling flood water away from housing could have made a difference without the extensive earth works in fields referred too above. If my suggestion of extensive tree planting in above fields instead of bunds and channels had been implemented the risks may already be reduced.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/thx

6372 Support

Document Element: Between Llantwit Major and

Respondent: Mr Hayden Pocock [3561]

Summary:

Conservation/Green Wedge - land between Llantwit Major and Llanmaes Ste ID 436 Proposal Number DNP (6)

In order to preserve the conservation status of Llanmaes as a small rural village community with agriculture as its mainstay, there must be no risk of coalescence with Llantwit Major. Llanmaes has a distinct identity meaning that, the setting up of this Green Wedge is essential.
Llanmaes is a small , but thriving community accessed from Sigingstone, St Mary Church, St Athan, Eglwys Brewis, and indeed Llantwit Major by a network of narrow unclassified lanes. These are enjoyed by walkers, horse riders, cyclists and of course shared by motor vehicles, including numerous working agricultural traffic. The proposed Green Wedge would serve to conserve this village as part of a network of small villages , which it is important to preserve, and is of particular relevance as Llanmaes will form part of a group of villages as part of the Boundary Commission's recommended changes.

Full text:

Conservation/Green Wedge - land between Llantwit Major and Llanmaes Ste ID 436 Proposal Number DNP (6)

In order to preserve the conservation status of Llanmaes as a small rural village community with agriculture as its mainstay, there must be no risk of coalescence with Llantwit Major. Llanmaes has a distinct identity meaning that, the setting up of this Green Wedge is essential.
Llanmaes is a small , but thriving community accessed from Sigingstone, St Mary Church, St Athan, Eglwys Brewis, and indeed Llantwit Major by a network of narrow unclassified lanes. These are enjoyed by walkers, horse riders, cyclists and of course shared by motor vehicles, including numerous working agricultural traffic. The proposed Green Wedge would serve to conserve this village as part of a network of small villages , which it is important to preserve, and is of particular relevance as Llanmaes will form part of a group of villages as part of the Boundary Commission's recommended changes.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3qn

6376 Support

Document Element: Between Llantwit Major and

Respondent: Mrs Jaqueline Hughes [3563]

Summary:

1. Conservation / Green Wedge - Land between Llantwit Major and Llanmaes [Site ID 436 Proposal Number DNP6(6)]
I would like to endorse this proposal: it ensures that the Llanmaes Conservation Area is protected. It prevents the coalescence of urban and rural environments, namely Llantwit Major and Llanmaes. The fields included in the Green Wedge create an important, peaceful transit zone into Vale lanes and countryside much loved and appreciated not only by Llanmaes residents but also (dog) walkers, runners, cyclists and horse riders who regularly visit this area. The Green Wedge would allow the continuation of a valuable asset that supports the wellbeing of villagers and visitors. Should fields not be protected this would open the floodgates to speculative development and loss of further green space.

Full text:

1. Conservation / Green Wedge - Land between Llantwit Major and Llanmaes [Site ID 436 Proposal Number DNP6(6)]
I would like to endorse this proposal: it ensures that the Llanmaes Conservation Area is protected. It prevents the coalescence of urban and rural environments, namely Llantwit Major and Llanmaes. The fields included in the Green Wedge create an important, peaceful transit zone into Vale lanes and countryside much loved and appreciated not only by Llanmaes residents but also (dog) walkers, runners, cyclists and horse riders who regularly visit this area. The Green Wedge would allow the continuation of a valuable asset that supports the wellbeing of villagers and visitors. Should fields not be protected this would open the floodgates to speculative development and loss of further green space.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3mq

6387 Support

Document Element: Between Llantwit Major and

Respondent: Llanmaes Community Council (Mrs C Alexander, Clerk) [240]

Summary:

1. Green Wedge/Conservation DNP2 Site 6 Land between Llantwit Major and Llanmaes
Llanmaes Community Council strongly supports this allocation (originally proposed and promoted by ourselves) within the RLDP Deposit Plan. This designation protects this area of open countryside against intrusions from the urban form. It also protects against the visual and physical coalescence of the Town of Llantwit Major and the Village of Llanmaes and protects the setting of the Llanmaes Conservation Area consistent with its adopted Management Plan. Development pressure on this strip of green space is significant as evidenced by the various housing, mixed and retail proposals made to date as part of the RLDP process. Having studied the background papers on the allocation of Green Wedges throughout the Vale of Glamorgan we note that this area scores the highest of all the Green Wedges across the county, including the five existing ones, as recorded in RLDP Background Paper 27 and tested against the Welsh Government's five purposes for designation of a Green Wedge. Therefore, we are very grateful to the RLDP team for their positive evaluation of this site for this classification. We also note the adjustments made to the area covered by the Green Wedge between that originally proposed by ourselves and that in the Deposit Plan and with the exception of the tentative retail designation of the Bridge House Farm parcel we have no objections to these.

Full text:

1. Green Wedge/Conservation DNP2 Site 6 Land between Llantwit Major and Llanmaes
Llanmaes Community Council strongly supports this allocation (originally proposed and promoted by ourselves) within the RLDP Deposit Plan. This designation protects this area of open countryside against intrusions from the urban form. It also protects against the visual and physical coalescence of the Town of Llantwit Major and the Village of Llanmaes and protects the setting of the Llanmaes Conservation Area consistent with its adopted Management Plan. Development pressure on this strip of green space is significant as evidenced by the various housing, mixed and retail proposals made to date as part of the RLDP process. Having studied the background papers on the allocation of Green Wedges throughout the Vale of Glamorgan we note that this area scores the highest of all the Green Wedges across the county, including the five existing ones, as recorded in RLDP Background Paper 27 and tested against the Welsh Government's five purposes for designation of a Green Wedge. Therefore, we are very grateful to the RLDP team for their positive evaluation of this site for this classification. We also note the adjustments made to the area covered by the Green Wedge between that originally proposed by ourselves and that in the Deposit Plan and with the exception of the tentative retail designation of the Bridge House Farm parcel we have no objections to these.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4s3

6408 Support

Document Element: Between Llantwit Major and

Respondent: Mr David Harris [2291]

Summary:

Land between Llantwit Major and Llanmaes Site ID 436 Proposal
DNP2(6). I fully support this to create a green wedge between the village of Llanmaes and the Llantwit Major By Pass for the following reasons.
Protects the land from future development
Llanmaes is a village and rural community and Llantwit Major is a town and urban community and it is important that coalescence does not exist between these two communities
Protects the views from the Llanmaes Conservation Area as detailed in the Vale of Glamorgan adopted conservation management plan.

Full text:

Land between Llantwit Major and Llanmaes Site ID 436 Proposal DNP2(6). I fully support this to create a green wedge between the village of Llanmaes and the Llantwit Major By Pass for the following reasons.
Protects the land from future development
Llanmaes is a village and rural community and Llantwit Major is a town and urban community and it is important that coalescence does not exist between these two communities
Protects the views from the Llanmaes Conservation Area as detailed in the Vale of Glamorgan adopted conservation management plan.

Change suggested by respondent:

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Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4ss

6416 Support

Document Element: Between Llantwit Major and

Respondent: Mrs Julie Garvey [3578]

Summary:

The conservation /green wedge between Llantwit Major and Llanmaes must be kept to protect the countryside and separate a village and a town. Further development of the village would be disastrous. The proposal of a supermarket would be detrimental to a village and the infrastructure could not cope with increased traffic and heavy goods vehicles delivering to the supermarket.

Full text:

The conservation /green wedge between Llantwit Major and Llanmaes must be kept to protect the countryside and separate a village and a town.
The village currently suffers from flooding and a flood alleviation scheme is desperately needed. Further development of the village would be disastrous.
The proposal of a supermarket would be detrimental to a village and the infrastructure could not cope with increased traffic and heavy goods vehicles delivering to the supermarket.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3nk

6688 Object

Document Element: North of Wenvoe;

Respondent: Powells (Mr Stuart Leaver, Head of Planning & Land Promotion) [887]

Summary:

Green Wedges are typically designated where there is demonstrable development pressure and where reliance solely on settlement boundaries would not be sufficient to maintain the desired urban form. Their purpose is therefore strategic rather than absolute: they are intended to guide the form and direction of development rather than impose a blanket prohibition on all development.

The Council's own Green Wedge Background Paper (BP27) assesses the land surrounding Culverhouse Cross as part of Green Wedge MG18 (3) – North of Wenvoe. The study divides the designation into a number of parcels (NW1, NW2 and NW3) and assesses their contribution against the five Green Wedge purposes.

Importantly, the assessment demonstrates that land immediately adjoining the urban edge of Culverhouse Cross does not perform a uniformly strong Green Wedge function.

For example, Parcel NW1 – which lies adjacent to the commercial and highway infrastructure associated with Culverhouse Cross – is identified as making only a weak contribution to the purpose of preventing settlement coalescence and a weak contribution to protecting the setting of the urban area, with an overall contribution rating of Moderate.

Similarly, Parcel NW2 – which also lies adjacent to the settlement edge – is assessed as making only a moderate contribution to preventing settlement coalescence and managing urban form, while again making only a weak contribution to protecting the setting of the settlement.

The study explicitly notes that some parcels around Culverhouse Cross do not lie within a gap where coalescence between settlements would occur, and therefore make only a limited contribution to that purpose.

These findings are important because they demonstrate that the Green Wedge designation in this location performs a varied and nuanced role rather than representing land of uniformly high strategic importance.

Importantly, the Green Wedge assessment itself acknowledges that the area around Culverhouse Cross experiences development pressure due to its relatively sustainable location on the western edge of Cardiff and its strong highway accessibility.

In this context, it is necessary for the development plan to strike a balance between protecting the strategic purposes of the Green Wedge and responding to identified housing needs.

Full text:

1. Introduction

This representation is submitted on behalf of Powells as land promoters of Candidate Site CS387 at Culverhouse Cross. The representation seeks to set out our comments on the RLDP draft deposit as well as set forward the case for the allocation of the site within the Vale of Glamorgan Replacement Local Development Plan (RLDP) for residential development of up to 50 dwellings, including a minimum of 50% affordable housing.

The site presents a deliverable, sustainable and policy-aligned opportunity to address significant affordable housing need within the Wenvoe housing market area. Despite Culverhouse Cross being identified as a Primary Settlement within the RLDP settlement hierarchy, the Deposit Plan does not allocate any residential development within the settlement.

This approach results in a number of fundamental inconsistencies within the Plan including:

• A settlement hierarchy that identifies Culverhouse Cross as a Primary Settlement but provides no growth.

• Evidence of significant affordable housing need within the Wenvoe ward that is not spatially addressed.

• Policy mechanisms intended to support affordable housing delivery (HG4 and HG5) that cannot realistically operate due to Green Wedge constraints.

• A spatial strategy that places disproportionate emphasis on rail-based settlements despite national policy promoting a wider placemaking-led approach to sustainability.

The representation therefore demonstrates that the RLDP is unsound in respect of Culverhouse Cross and that Candidate Site CS387 represents a sustainable and deliverable allocation capable of addressing identified housing need.

2. Settlement Hierarchy and Spatial Strategy

2.1 Primary Settlement Status

The Deposit RLDP identifies Culverhouse Cross as a Primary Settlement outside the Strategic Growth Area within the settlement hierarchy. Under Policy SP2, Primary Settlements represent the highest tier of settlement outside the strategic growth corridor and are identified as locations capable of accommodating limited but proportionate levels of development, reflecting their relative accessibility, services, employment opportunities and role within the wider settlement network.

In spatial planning terms, the identification of a settlement as a Primary Settlement carries clear strategic implications. It indicates that the settlement performs an important functional role within the authority and that it represents one of the most sustainable locations for accommodating development outside the Strategic Growth Area. The hierarchy therefore provides the principal framework through which the Plan distributes housing growth across the authority.

However, despite this designation, the RLDP allocates no housing growth whatsoever within Culverhouse Cross.

This creates a clear inconsistency between the settlement hierarchy and the spatial distribution of development. If a settlement is identified within the hierarchy as capable of supporting development, the development plan should logically identify opportunities through which that growth can occur. The absence of any allocations, windfall capacity or clearly

defined delivery mechanisms means that the designation has no practical effect within the spatial strategy.
In technical planning terms this weakens the internal coherence of the Plan. The Development Plans Manual requires that the spatial strategy and settlement hierarchy operate as a clear and consistent framework guiding the distribution of development. Where a hierarchy identifies settlements as sustainable locations for growth but the Plan subsequently provides no mechanism for that growth to occur, the hierarchy risks becoming descriptive rather than operational.
In the case of Culverhouse Cross, the RLDP acknowledges the settlement's role within the hierarchy but does not translate that role into spatial planning outcomes. The settlement was identified as a Primary Settlement largely due to its functional role as a significant retail, employment and transport hub, together with the recent residential redevelopment of the former ITV studios which has increased its residential function. Whilst the Council appears to treat this redevelopment as a one-off brownfield opportunity that does not justify further greenfield growth, the reality is that the decision to redevelop the site for housing rather than employment has established the principle that residential development is appropriate in this location. When considered alongside the settlement's designation as a Primary Settlement, this demonstrates that the Council itself has already accepted the sustainability of residential growth at Culverhouse Cross. Despite these characteristics, the allocation strategy effectively treats Culverhouse Cross as if it were a settlement where growth is not supported, thereby failing to reflect the very factors that justified its elevation within the settlement hierarchy.
The complete absence of housing allocations at Culverhouse Cross therefore undermines the credibility of the hierarchy and creates an incoherent spatial strategy, particularly where other settlements within the same tier of the hierarchy are expected to accommodate growth. Applying unequal weight to settlements within the same settlement category introduces inconsistency into the spatial strategy and raises concerns regarding the overall soundness of the Plan.
2.2 Consequences of the Current Approach
The failure to allocate development in Culverhouse Cross has several important consequences for the effectiveness of the Plan.
• Unmet Local Housing Need – Local affordable housing needs within the Wenvoe ward are not addressed within the spatial distribution of development. The RLDP therefore fails to demonstrate how identified housing need within this part of the authority will be met.
• Ineffective Settlement Hierarchy – The settlement hierarchy fails to operate as a meaningful spatial planning tool. If Primary Settlements are not expected to accommodate any development, the distinction between settlement tiers becomes blurred and the hierarchy ceases to function as a mechanism for directing growth.
• Displacement of Development Pressure – Housing demand associated with the eastern Vale is displaced to other settlements rather than being distributed across the settlement network in accordance with the hierarchy. This results in an imbalanced spatial strategy.
• Loss of Sustainable Small-Scale Opportunities – Opportunities for small-scale affordable housing delivery in locations close to employment, services and public transport are lost. This is particularly relevant in the case of Culverhouse Cross which functions as a significant employment and retail centre.
• Policy Mechanisms That Cannot Operate – The Plan relies on affordable housing exception mechanisms to deliver housing within settlements such as Culverhouse Cross. However, the extent of Green Wedge designation means that these mechanisms cannot realistically function without explicit clarification within the Plan.
Taken together these issues demonstrate that the current spatial strategy does not fully respond to the functional role of Culverhouse Cross within the settlement hierarchy and results in a distribution of development that is neither balanced nor responsive to local housing needs.
3. Affordable Housing Need and Delivery
3.1 Evidence of Need
The Council's own housing evidence demonstrates a substantial requirement for affordable housing across the Vale of Glamorgan, including within rural settlements and the Wenvoe housing market area. The Local Housing Market Assessment identifies a significant backlog of need together with an ongoing annual requirement for additional affordable homes throughout the plan period. Whilst Welsh Government has queried the justification for elevating Culverhouse Cross to Primary Settlement status during the plan preparation process, the available evidence demonstrates that the settlement performs a clear functional role within the eastern Vale. In particular, the settlement benefits from strong bus connectivity to Cardiff and Barry together with established cycle and active travel links, and it sits within a ward where unmet affordable housing need has been clearly identified. When these factors are considered together, they reinforce the rationale for recognising Culverhouse Cross as a sustainable location capable of accommodating proportionate residential growth. This evidence confirms that the need for affordable housing is not confined to the authority's largest settlements but exists across the wider settlement network, including rural wards.
Affordable housing need is particularly acute for smaller one to three bedroom homes, reflecting the changing composition of households and the prevalence of single person and smaller family households. Waiting list data demonstrates significant unmet demand across the authority, particularly for social rented and intermediate homes that are accessible to lower and middle income households.
Within the Wenvoe ward specifically, housing register data identifies a clear need for affordable housing that cannot currently be met through existing supply. This indicates that households with a local connection to the area are unable to access suitable housing within their own community and must either remain in unsuitable accommodation or relocate to other settlements.
Despite this evidence, the RLDP does not allocate any sites capable of delivering affordable housing within Culverhouse Cross or Wenvoe. The absence of allocations means that the Plan does not clearly demonstrate how identified affordable housing needs arising within this part of the authority will be addressed. In spatial planning terms this raises concerns regarding the effectiveness of the Plan, as development plans are expected to respond directly to evidenced housing need and ensure that opportunities for affordable housing delivery are distributed across the settlement hierarchy rather than concentrated solely within a limited number of locations.

3.2 Role of Affordable Housing in the RLDP
The RLDP identifies a requirement to deliver a significant number of affordable homes during the plan period in order to respond to the substantial backlog of need identified within the Local Housing Market Assessment. In practice the Plan relies upon several delivery mechanisms to achieve this target, including:
• Affordable housing contributions secured through Section 106 agreements on market housing sites • Affordable housing-led allocations delivering a minimum proportion of affordable homes • Affordable housing exception sites outside settlement boundaries • Windfall development opportunities that may arise during the plan period
For the overall strategy to be effective, these mechanisms must operate across the settlement hierarchy so that affordable housing delivery is not overly concentrated in a small number of locations. However, in the case of Culverhouse Cross none of these mechanisms realistically provide delivery opportunities. There are no allocated housing sites within the settlement capable of generating affordable housing contributions, no affordable housing-led allocations within the settlement boundary, and the extensive Green Wedge designation surrounding the settlement significantly constrains the realistic operation of the affordable housing exception site policy. In practical terms this means that, despite clear evidence of unmet affordable housing need within the Wenvoe ward, the RLDP does not identify any credible mechanism through which that need could be addressed locally. This further reinforces the conclusion that the spatial strategy fails to respond effectively to evidenced housing need in this part of the authority.
4. Policy HG4 and HG5 – Practical Deliverability
4.1 Affordable Housing Led Sites (HG4)
Policy HG4 identifies affordable housing-led allocations delivering a minimum of 50% affordable housing.
However these sites are located within settlement boundaries.
At Culverhouse Cross there are no available sites within the settlement boundary capable of delivering such schemes.
As a result HG4 cannot operate as an effective delivery mechanism in this settlement.
4.2 Affordable Housing Exception Sites (HG5)
Policy HG5 allows small-scale affordable housing exception sites outside settlement boundaries where a clear local need is demonstrated.
Culverhouse Cross is specifically identified as a settlement where exception sites may be appropriate.
However the majority of land surrounding the settlement is designated as Green Wedge.
The RLDP does not clearly explain how Policy HG5 should operate where land is also designated as Green Wedge.
This creates a policy ambiguity.
If Green Wedge policy prevents the operation of HG5 entirely, then the policy mechanism identified by the Council for delivering affordable housing in these settlements cannot realistically function.
If HG5 is intended to operate within Green Wedges where the strategic function of the designation is not harmed, then the Plan should make this clear.
Without this clarification the Plan risks creating theoretical delivery mechanisms that cannot be implemented in practice.
5. Green Wedge Considerations
5.1 Purpose of Green Wedges
Green Wedge designations are local planning policy tools used to manage the form of settlements and prevent inappropriate expansion of built development into open countryside. Planning Policy Wales explains that Green Wedges perform a similar function to Green Belts at a local level and are primarily intended to protect the spatial separation between settlements and maintain the distinction between urban areas and the countryside.
Green Wedges are typically designated where there is demonstrable development pressure and where reliance solely on settlement boundaries would not be sufficient to maintain the desired urban form. Their purpose is therefore strategic rather than absolute: they are intended to guide the form and direction of development rather than impose a blanket prohibition on all development.
National policy identifies five principal purposes for Green Wedges:
• Preventing the coalescence of large towns or cities with neighbouring settlements. • Managing urban form through controlled expansion of urban areas. • Assisting in safeguarding the countryside from encroachment. • Protecting the setting of urban areas. • Assisting urban regeneration by encouraging the recycling of urban land.
Planning Policy Wales also makes clear that Green Wedges should be reviewed as part of the development plan process and should only be retained where there is a demonstrable need for their continued designation.
5.2 Evidence from the Green Wedge Assessment
The Council's own Green Wedge Background Paper (BP27) assesses the land surrounding Culverhouse Cross as part of Green Wedge MG18 (3) – North of Wenvoe. The study divides the designation into a number of parcels (NW1, NW2 and NW3) and assesses their contribution against the five Green Wedge purposes.
Importantly, the assessment demonstrates that land immediately adjoining the urban edge of Culverhouse Cross does not perform a uniformly strong Green Wedge function.
For example, Parcel NW1 – which lies adjacent to the commercial and highway infrastructure associated with Culverhouse Cross – is identified as making only a weak contribution to the purpose of preventing settlement coalescence and a weak contribution to protecting the setting of the urban area, with an overall contribution rating of Moderate.
Similarly, Parcel NW2 – which also lies adjacent to the settlement edge – is assessed as making only a moderate contribution to preventing settlement coalescence and managing urban form, while again making only a weak contribution to protecting the setting of the settlement.
The study explicitly notes that some parcels around Culverhouse Cross do not lie within a gap where coalescence between settlements would occur, and therefore make only a limited contribution to that purpose.
These findings are important because they demonstrate that the Green Wedge designation in this location performs a varied and nuanced role rather than representing land of uniformly high strategic importance.
5.3 Relationship of the Site to the Green Wedge

Candidate Site CS387 occupies a contained position immediately adjacent to the existing urban edge of Culverhouse Cross. In spatial terms the site sits within an area where the Green Wedge assessment identifies only a moderate contribution to the strategic purposes of the designation.
The Green Wedge study also recognises that the retail park, major highway infrastructure and recent residential development at the former ITV studios site exert an urbanising influence on the surrounding land.
Against this context, the development of a small and contained residential scheme adjacent to the settlement boundary would represent a logical rounding-off of the urban edge rather than a significant extension of built form into the wider countryside.
The proposal has been carefully designed to retain areas of open land and maintain visual openness across the wider Green Wedge. Landscape buffers and retained open areas would ensure that the remaining Green Wedge continues to fulfil its strategic function.
Importantly, the Green Wedge assessment itself acknowledges that the area around Culverhouse Cross experiences development pressure due to its relatively sustainable location on the western edge of Cardiff and its strong highway accessibility.
In this context, it is necessary for the development plan to strike a balance between protecting the strategic purposes of the Green Wedge and responding to identified housing needs. The limited and carefully contained development proposed at Candidate Site CS387 would achieve this balance by delivering much needed affordable housing while maintaining the wider strategic function of the Green Wedge.
5.4 Implications for the Spatial Strategy
Candidate Site CS387 occupies a contained position adjacent to the existing urban edge of Culverhouse Cross. Green Wedge in this location has been defined as performing a low function in terms of preventing coalescence which is set out within the Councils' own Green Wedge study.
Development of the site would represent a logical rounding-off of the settlement rather than an incursion into open countryside.
The proposal has been carefully designed to retain areas of open land and maintain visual openness across the wider Green Wedge.
The development would therefore not undermine the strategic objective of preventing coalescence between Culverhouse Cross and Cardiff.
6. Sustainability of Culverhouse Cross
6.1 Functional Sustainability
Culverhouse Cross functions as a significant employment, retail and service centre within the eastern Vale of Glamorgan and forms one of the principal commercial hubs on the western edge of Cardiff. Although the settlement has historically been characterised primarily by commercial uses, recent residential development has strengthened its role as a mixed-use location where people can live, work and access services within close proximity.
The settlement benefits from a number of key sustainability characteristics which support its role within the settlement hierarchy, including:
• Major retail and employment areas including the Valegate and Culverhouse Cross retail parks which provide a substantial range of jobs and services. • Frequent bus services linking the settlement with Cardiff, Barry and surrounding communities. • Access to established active travel routes connecting the settlement with nearby residential areas and employment locations. • Immediate proximity to strategic highway infrastructure including the A48 and A4232, providing direct connectivity to Cardiff and the wider regional road network.
Taken together, these characteristics mean that Culverhouse Cross operates as a highly accessible location where residents are able to access employment, retail and service opportunities within walking distance or via short public transport journeys. The presence of significant employment uses within the settlement further reduces the need for long-distance commuting and supports the creation of a more self-contained and sustainable community.
Importantly, sustainability within national planning policy is not defined solely by the presence of rail infrastructure but rather by the ability of residents to access services, employment and facilities through a range of transport modes. In this respect Culverhouse Cross performs strongly due to the combination of employment opportunities, public transport connectivity and proximity to Cardiff.
6.2 Alignment with National Policy
National planning policy promotes development in locations where people are able to access jobs, services and community facilities without the need for excessive travel. Planning Policy Wales in particular emphasises the importance of locating new housing in places that support sustainable placemaking outcomes and reduce reliance on private car travel.
Culverhouse Cross clearly meets these criteria. The settlement provides immediate access to employment, retail, healthcare and service facilities together with strong public transport connections into Cardiff and other nearby settlements. This level of accessibility is entirely consistent with the principles of sustainable development promoted through national planning policy.
The absence of a rail station does not in itself render a location unsustainable. Many settlements across Wales function successfully as sustainable communities without direct rail connectivity where other transport options and local services are available.
An approach to spatial planning which places disproportionate emphasis on rail-based settlements risks overlooking locations such as Culverhouse Cross which already function as important employment and service centres within the wider settlement network. A transport strategy focused solely on rail connectivity fails to recognise the role of bus services, active travel and proximity to employment in supporting sustainable communities.
7. Site Suitability and Deliverability
7.1 Deliverability
The site is available, viable and capable of being delivered within the early years of the Plan period. Importantly, the site

does not rely on complex land assembly, strategic infrastructure investment or long lead-in times that often delay the delivery of larger strategic allocations.
Key deliverability characteristics include:
• Single land ownership – The site is controlled by a single, motivated landowner working in partnership with an experienced land promoter. This removes the risk of fragmented ownership which can frequently delay the delivery of allocated sites.
• No abnormal infrastructure requirements – The site does not require strategic highway works, major utility diversions or significant ground remediation. Development can therefore proceed without the need for substantial upfront infrastructure investment.
• Existing access arrangements – The site benefits from an established access point which currently serves the lawful dog-walking business operating on the land. This demonstrates that the site already functions as an accessible and serviced parcel of land and reduces the complexity of future development.
• Demonstrated viability – Preliminary development appraisal work indicates that the site can support a scheme delivering approximately 50 dwellings including a minimum of 50% affordable housing while remaining financially viable. This reflects realistic build costs and values within the local housing market.
Taken together, these factors demonstrate that the site represents a deliverable short-term opportunity capable of contributing to the Council's housing supply early in the plan period. This is particularly important given the well-recognised need for development plans to allocate sites that can deliver housing quickly rather than relying solely on longer-term strategic sites.
7.2 Development Capacity
The proposed site could deliver approximately 50 dwellings, including a minimum of 50% affordable housing, in accordance with the objectives of Policy HG4 and the wider affordable housing strategy within the RLDP.
This scale of development has been carefully considered to ensure that it reflects the role of Culverhouse Cross within the settlement hierarchy while remaining proportionate to the size and character of the settlement. As a Primary Settlement outside the Strategic Growth Area, Culverhouse Cross is identified as a location capable of accommodating limited but meaningful levels of growth that support local housing needs.
A scheme of around 50 homes represents an appropriate and sustainable level of development which would:
• Provide a meaningful contribution towards meeting local affordable housing need within the Wenvoe ward. • Integrate effectively with the existing built form at the edge of Culverhouse Cross. • Avoid the need for large-scale urban expansion or major infrastructure investment. • Maintain the wider strategic function of the surrounding Green Wedge through a contained and well-designed development footprint.
Importantly, the proposed capacity reflects a small-scale extension to the existing settlement, rather than a strategic urban expansion. This approach aligns with the spatial strategy for Primary Settlements outside the Strategic Growth Area, where proportionate growth is expected to occur through modest and deliverable sites capable of meeting local needs.
The proposed allocation would therefore represent a logical and sustainable opportunity for residential development that complements the role of Culverhouse Cross within the settlement hierarchy while supporting the delivery of much-needed affordable housing.
8. Soundness of the RLDP
For a development plan to be considered sound it must satisfy the key tests set out within the Development Plans Manual and national planning policy. In summary, a sound plan must be:
• Justified – founded on a robust and credible evidence base and representing the most appropriate strategy when considered against reasonable alternatives. • Effective – deliverable over the plan period with clear and realistic mechanisms for implementation. • Consistent with national policy – aligned with the principles and objectives of Planning Policy Wales and the wider framework for sustainable placemaking.
The current RLDP approach to Culverhouse Cross raises significant concerns in relation to each of these tests.
Justified
The Plan identifies Culverhouse Cross as a Primary Settlement outside the Strategic Growth Area, recognising its accessibility, employment function and role within the wider settlement network. However, despite this designation, the RLDP allocates no housing growth whatsoever within the settlement.
This creates a clear disconnect between the evidence underpinning the settlement hierarchy and the spatial strategy that flows from it. If the evidence base demonstrates that Culverhouse Cross is sufficiently sustainable to be classified as a Primary Settlement, it logically follows that the Plan should provide opportunities for proportionate residential growth within or adjoining the settlement.
The absence of any allocations therefore raises questions as to whether the spatial strategy represents the most appropriate approach when considered against reasonable alternatives. In particular, the Plan does not adequately explain why modest growth opportunities adjacent to the settlement boundary – such as the proposed allocation of Candidate Site CS387 – have been discounted despite their potential to deliver significant levels of affordable housing.
Effective
A development plan must demonstrate that its strategy can be realistically delivered over the plan period. In this case the RLDP relies heavily on a number of policy mechanisms to deliver affordable housing, including market-led allocations, affordable housing-led sites and rural exception sites.
However, these mechanisms are not capable of operating effectively within Culverhouse Cross. There are no allocated sites within the settlement capable of generating affordable housing contributions, no affordable housing-led allocations within the settlement boundary, and the extensive Green Wedge designation surrounding the settlement severely restricts the realistic operation of affordable housing exception sites.
As a result, although the Plan identifies a clear need for affordable housing within the Wenvoe ward, it fails to identify any credible delivery mechanism through which that need could be addressed locally. This creates a clear risk that the Plan

will not deliver the spatial distribution of affordable housing that its evidence base identifies as necessary.
Consistent with National Policy
Planning Policy Wales places strong emphasis on sustainable placemaking and the creation of communities where people are able to access employment, services and facilities without the need for excessive travel. National policy also promotes the efficient use of land and encourages development in locations that already benefit from strong transport connections and established infrastructure.
Culverhouse Cross performs strongly against these principles. The settlement functions as a major retail and employment hub on the western edge of Cardiff and benefits from frequent bus services, active travel links and immediate access to strategic road infrastructure.
The spatial strategy set out in the RLDP does not fully reflect these placemaking principles. By directing growth away from Culverhouse Cross despite its accessibility and service base, the Plan risks overlooking opportunities to deliver sustainable residential development in locations where people can live close to employment and services.
Taken together, these issues demonstrate that the current strategy for Culverhouse Cross is not fully justified by the evidence, cannot be shown to operate effectively in practice, and does not fully reflect the wider objectives of national planning policy. The allocation of Candidate Site CS387 would provide a practical and proportionate means of addressing these shortcomings while supporting the delivery of affordable housing within a sustainable settlement location.
9. Proposed Modification
To address the issues identified throughout this representation it is recommended that the RLDP be modified to allocate Candidate Site CS387, Land at Culverhouse Cross, for residential development. The allocation would represent a modest and proportionate extension to the existing settlement boundary and would provide a practical mechanism through which the Plan could respond to clearly identified affordable housing needs within the Wenvoe ward.
The modification would ensure that the spatial strategy properly reflects the role of Culverhouse Cross within the settlement hierarchy while maintaining the strategic purposes of the surrounding Green Wedge designation.
The allocation should provide for:
• Up to 50 dwellings delivered as a carefully planned settlement edge scheme which integrates with the existing built form at Culverhouse Cross.
• A minimum of 50% affordable housing, ensuring that the development makes a meaningful contribution towards meeting the substantial backlog of affordable housing need identified within the Local Housing Market Assessment and the housing register for the Wenvoe ward.
• Landscape buffers and retained open space, designed to maintain visual openness and ensure that the remaining Green Wedge continues to fulfil its strategic function in preventing the coalescence of settlements.
Incorporating this allocation within the RLDP would enable the Plan to:
• Address locally evidenced housing need by providing an opportunity to deliver affordable homes within the community where demand has been identified.
• Support the role of Culverhouse Cross as a Primary Settlement by allowing proportionate residential growth that reflects the settlement's accessibility, employment base and transport connectivity.
• Deliver affordable housing in a sustainable location, close to employment areas, retail services and public transport routes.
• Provide a deliverable short-term housing site capable of contributing to housing supply early in the plan period.
• Maintain the strategic function of the Green Wedge by focusing development on a contained parcel of land adjacent to the urban edge while retaining substantial areas of open land.
• Improve the effectiveness and soundness of the RLDP by ensuring that the spatial strategy properly aligns with the settlement hierarchy and that credible delivery mechanisms exist for affordable housing within this part of the authority.
Alternative Policy Approach
In the event that the Council is not minded to allocate Candidate Site CS387, an alternative and equally effective modification would be to introduce a policy mechanism that allows affordable housing-led windfall sites within Primary Settlements located in Green Wedge designations, where it can be clearly demonstrated that development would not undermine the strategic purpose of the Green Wedge.
Such a policy could allow modest residential schemes where:
• the development is affordable housing-led, providing a significant proportion of affordable homes; • the site is adjacent to the existing settlement boundary and represents a logical rounding-off of the urban edge; • it can be demonstrated that the development would not result in unacceptable coalescence between settlements; • the scheme retains sufficient open land and landscape buffers to maintain the wider openness of the Green Wedge.
Introducing such a mechanism would provide a practical means of ensuring that affordable housing needs in settlements such as Culverhouse Cross can be addressed without undermining the strategic purpose of the Green Wedge designation. It would also resolve the current policy ambiguity whereby the Plan identifies settlements such as Culverhouse Cross as suitable locations for affordable housing exception sites but does not clearly explain how such sites can come forward where surrounding land lies within the Green Wedge.
This approach would therefore improve the effectiveness, flexibility and soundness of the RLDP by ensuring that affordable housing delivery mechanisms can operate in practice across the full settlement hierarchy.
10. Conclusion
Culverhouse Cross represents a sustainable and appropriate location for small-scale residential growth when considered against the evidence base underpinning the RLDP and the wider objectives of national planning policy. The settlement functions as an established employment, retail and service hub on the western edge of Cardiff and benefits from strong public transport connections, active travel links and direct access to strategic highway infrastructure. These characteristics have already been recognised through the Council's decision to designate Culverhouse Cross as a Primary Settlement within the settlement hierarchy.

Despite this designation, the RLDP does not allocate any housing within the settlement and does not identify any credible mechanism through which locally arising housing needs can be addressed. This creates a clear inconsistency within the spatial strategy. A settlement which is recognised as sustainable and capable of accommodating proportionate levels of development cannot logically be treated as a location where no growth is expected to occur.
The absence of allocations also prevents the delivery of much-needed affordable housing within the Wenvoe ward, where the Council's own evidence identifies a clear and persistent backlog of need. Without opportunities for development within or adjoining Culverhouse Cross, households with a local connection to the area are likely to be displaced to other settlements, undermining the objective of creating balanced and inclusive communities across the Vale of Glamorgan.
Candidate Site CS387 provides a deliverable and policy-compliant opportunity to address this issue. The site represents a modest and contained extension to the existing settlement boundary and is capable of delivering approximately 50 dwellings including a minimum of 50% affordable housing. The proposal has been carefully designed to integrate with the existing built form, maintain the wider function of the surrounding Green Wedge and provide a meaningful contribution towards meeting local housing needs.
Allocating the site would therefore provide a practical and proportionate means of improving the effectiveness of the RLDP. It would ensure that the spatial strategy properly reflects the role of Culverhouse Cross within the settlement hierarchy, provide a credible mechanism for delivering affordable housing within this part of the authority and support sustainable placemaking in accordance with national planning policy.
For these reasons it is considered that Candidate Site CS387 should be allocated within the RLDP. Doing so would help ensure that the Plan provides a coherent, deliverable and policy-compliant framework for guiding development across the Vale of Glamorgan over the plan period.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/35v

6792 Support

Document Element: Between Dinas Powys, Penarth

Respondent: Persimmon Homes (East Wales) [1068]

Agent: Boyer Planning

Summary:

Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need

In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.

Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.

Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.

Section 4: Key Themes, Vision & Objectives

Key Themes

Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.

In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.

Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.

Vision

In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.

The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.

In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.

Strategic Objectives

Objective 3 – Home for All

Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.

Objective 4 – Placemaking

As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.

Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.

Objective 8 – Promoting Active and Sustainable Travel Choices

Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.

Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.

Section 5: Sustainable Growth Strategy

RLDP Sustainable Growth Strategy comprises six key elements as follows:

1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).

In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.

Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.

Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.

Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.

In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.

From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.

Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.

As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.

Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.

Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.

Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.

Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)

3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.

The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.

Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.

In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps

which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale. This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either

adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.
In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.
Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual
As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement

From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.

As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.

Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.

Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.

Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.

Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.

In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

Policy SP2 – Settlement Hierarchy

In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.

Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.

Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.

Policy SSC1 – Development within Settlement Boundaries

Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.

Policy SP4 – Placemaking

In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.

The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.

In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car. Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.

The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.

Policy PGD1 – Creating Well Designed and Inclusive Places

Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.

On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.

Policy PGD2 – Residential Development Densities

Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.

From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.

A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.

The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.

Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.

Policy SP5 – Creating Healthy & Inclusive Places and Spaces

Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.

The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.

The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the

Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing

industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.

Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.

As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.

The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.

Loss of Allocated Employment Land

Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.

Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.

By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)

Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.

According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.

On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.

Policy HG3 – Housing Led Redevelopment Opportunity

Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.

Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that

these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
Policy SP7 – Affordable Housing Provision
In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
Policy SP8 – Affordable Housing Requirements
Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.
Policy SP10 – Sustainable Transport
Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives.
Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.
In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
Policy TR1 – Transport Proposals
Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement

capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.

In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.

Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.

Policy SP13 – Community Infrastructure and Planning Obligations

Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.

Policy CI1 – Open Space Provision

Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.

The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.

Productive and Enterprising Places

Policy CC1 – Residential Operational Net Zero Carbon Development

Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.

Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.

Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.

The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.

Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.

Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.

Distinctive and Natural Places
Policy SP19 – Green Infrastructure
In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.
The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.
Policy SP20 – Biodiversity and Ecosystem Resilience
In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.
Policy DNP1 – Special Landscape Areas
Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.
Policy DNP2 – Green Wedges
Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.
Policy DNP8 – Severn Estuary Recreational Pressure
Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
Conclusion
Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes' most pertinent comments on the consultation document are summarised below:
• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a

higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/38r

6925 Object

Document Element: North of Wenvoe;

Respondent: Barratt Redrow Homes [2669]

Agent: Boyer Planning

Summary:

Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2.

Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.

From a landscape and visual perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.

Full text:

1. INTRODUCTION
1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.

1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:
• Section 3 – The Vale of Glamorgan Key Characteristics;
• Section 4 – RLDP Key Themes, Vision, and Objectives;
• Section 5 – Sustainable Growth Strategy; and
• Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.
1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS
Settlement Pattern
2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.
2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Need
2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
3. RLDP KEY THEMES, VISION, AND OBJECTIVES
3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.
Key Themes
3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.
3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and

are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY
Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to

positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places
5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
5.10 For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
5.11 More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
5.12 Whilst Barratt Redrow appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range, having reviewed the Deposit Plan evidence base Barratt Redrow believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
5.13 In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
5.14 Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
5.15 In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

5.16 In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need. Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.
5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.
5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036) and therefore is made up of

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.
5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.
5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.
5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.
5.27 In summary, Barratt Redrow acknowledge the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
5.28 These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance and additional site allocations, such as Swn Y Coed, Wenvoe, are necessary to ensure the RLDP is

able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

Policy SP2 – Settlement Hierarchy

5.29 Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.

5.30 Accordingly, despite Wenvoe being identified as a primary settlement, Policy SP2 notes that development in this location will be limited to 'the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.' Similarly, it is noted that Policy SP2 does not consider Wenvoe to be an appropriate location for ''substantial additional growth''.

5.31 Barratt Redrow object to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified.

5.32 First of all, the Deposit Plan acknowledges that it performs a similar function to the Primary Settlements located within the Strategic Growth Area and it is described as one of the 'sustainable communities' in The Vale of Glamorgan Key Characteristics section, as noted previously in Section 3.

5.33 Likewise, the site benefits from excellent accessibility the local public transport network, active travel routes and local services. These characteristics fully accord with Welsh Government's strategic objectives and emphasise the fact that Swn Y Coed constitutes an appropriate location for future housing.

5.34 With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge''. Barratt Redrow do not consider this to be sufficient justification to discount the site from allocation as there would be limited impact on BMW agricultural land arising from the development of Swn Y Coed.

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available.

5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.

Policy SP4 - Placemaking

5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.

5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:

5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.

5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.

5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.

5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.

Policy PGD1 – Creating Well Designed and Inclusive Places

5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.

Policy PGD2 – Residential Development Densities

5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.

5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.

5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.

5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent

with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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Unsustainable Location & Poor Connectivity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the

region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.

• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.

• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.

• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.

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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.

• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.

• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.

• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.

• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.

• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.

• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.

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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)

• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
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• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply
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• HG1 (8) St Athan - Clive Road, St Athan

Policy HG3 – Housing Led Redevelopment Opportunity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the

Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.

• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).
• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4).Finally, the Council's own Viability Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.
• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.
• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:
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Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:
i. Space heating demand less than or equal to 40kWh/m2/year;
ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the

thresholds.
• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
•

Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.

• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established 'defensible' limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be 'largely shielded from view by woodland blocks/strips'.
• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for 'infilling' the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.
• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
•

Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
•

Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.
• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
•

MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
•
• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
•
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
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CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the Council's vision for the VoG.
• 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of

housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
• 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
•

6. CONCLUSION
• Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.
• Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swn Y Coed, are necessary to ensure the RLDP is able to effectively meet
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Barratt Redrow welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Barratt Redrow support the requirements for affordable housing in new development. In its current form the proposed policies SP7 and SP8 lack sufficient flexibility for site specific circumstances and physical constraints which may impact upon delivery. This inevitably creates uncertainty for a number of sites, where the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities.
• From a planning perspective it is also important to recognise the additional benefits the site (Candidate Site Ref No. 437) could provide in accommodating the increased housing need generated by the suggested 15% flexibility allowance within a highly sustainable location. The principles of which clearly align with the Council's aspirations and would maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3ch

6945 Support

Document Element: DNP2 – GREEN WEDGES

Respondent: Penarth Town Council (Mr Pete Newton, Principal Policy, Innovation and Development Officer) [1125]

Summary:

Members supported the avoidance of coalescence with adjacent settlements through the reconfirmation of Green Wedges as it allows for relevant extensions to those settlements whilst allowing them to retain their identity.

Full text:

Penarth Town Council Deposit RLDP Consultation Response

Comments collated at a meeting of the Council's Consultation Task and Finish Group on 9th February 2026

Some Members attended the RLDP consultation drop-in session in Penarth and in general found it to be very informative.

Members support the general development strategy but did note the lack of information concerning discussions with adjacent and other nearby Principal Councils in the CJC Region. In view of the forthcoming Strategic Development Plan, encompassing the ten authorities, members felt that some further commentary regarding this is warranted.1

It is clear that the approach taken in the Cardiff paper is still that ideally, each Council is self-contained and "consumes its own smoke," which does not show any wider strategic thinking between the ten authorities in preparation for a regional Strategic Development Plan.

Members agreed with the view that infrastructure to support new housing developments was required in order to create successful developments, although they acknowledged that logistically it was difficult to pre-empt demand for some services such as travel and health services. Members also noted that predicting developmental needs and opportunities within wider context surrounding the UK's economic, political, and social landscapes.

Members noted that there was not much focus on Penarth or identified potential future development for Penarth beyond that already underway at the location near to Cosmeston but welcomed flexibility in its approach. Members expected to be more closely involved in the decisions and planning of this, and other such developments, and provide opportunity for wider consultation where appropriate, such as pre-application consultations, as well as would expect to be included in consultations concerning sites adjacent to Llandough, Dinas Powys, and Sully given their impact upon the town.

Penarth as a town is currently developed to its boundaries, save for the development at Cosmeston. It is, therefore, more dependent than other Service Centres on windfalls of land or buildings which may arise during the currency of the Plan. In 2023, an extensive assessment of the potential of the town concluded the following:

"There is marginally less capacity in Penarth [and Llandough] than the projected figures. However, this does not mean that the projections are incorrect or unjustifiable. The reported figures have not included a significant amount of capacity on open space land, and the projected figures for conversion of existing buildings and intensifications will be surpassed if the extant consents that exist this early in the Plan period are implemented."

The degree of flexibility, however, is substantially depending on one large site. P009, Headland School, is identified as both a potentially disused building and as a site with a capacity of 111-120 units. This special school is full to capacity and used by many Council in both Wales and England.

Members did note the inclusion of Cogan Transport Interchange under section 6.196 but would have liked to see more information about its future developments as they see it as key to increasing public transport use to Barry and further to West Wales in general.

Members wished to advise that issues with both the bridge and the platforms at Cogan have been long term, with accessibility being central to these issues. Members felt that improvements to accessibility should be a priority at this site, with planting and landscaping considered secondary to this.

Members felt it was key to consider the additional stress on Penarth from increased anticipated demand of public transport needs and emphasised the need for this to be aptly considered by bus route providers as part of development work.

Members wanted to see a strategy that actively protects the town's heritage and culture whilst still being able to provide for current and future generations.

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16 and section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report2, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Under CC2, it was noted that the presumption against demolition3 in favour of retrofit and reuse may constrain maximum transition to net zero as, whilst there is grant aid available for public buildings and social housing, the retrofit monies available for private stock is limited.

Additional considerations will also need to be made as part of the Third Carbon Budget (2026-2030), Local Area Energy Plans and the climate change ISA theme.

Members also felt similar about the inclusion and consideration of sustainable development through the specific strategy outlined in section 5 of the document and felt this linked in well with ongoing Placemaking work and its strategic approach as detailed in SP4.

Members were pleased to see mention of the diversification of high streets, although noted that Penarth was above average in terms of occupancy. They hoped that the RLDP would be able to support the town centre and support other ways it could be improved, such as a fishmonger or identifying a site for a new Cemetery.

With Penarth classified as a Service Centre, they are identified as having a defined role. However, the decline of in-person retailing means that defining role is not that evident, and Members felt there is potentially a need to move away from the traditional retail role of Town Centres in favour of "repurposing, creating multifunctional, commercial, and service centres that meet the needs of the communities they serve" in line with Future Wales Town Centre First Policy. The term 'repurposing' suggests a stronger role for the public sector in enabling these new purposes, and Members felt that Placemaking Plans could be one potential framework for this.

Members felt that potential functional support that could be provided could include:
• The appointment of a Town Centre Manager
• Using supporting interventions such as an extension or reshaping of normal services such as Neighbourhood Services.
• Using existing or emerging new powers, such as compulsory purchases.

Members wished for the RLDP to facilitate the safeguarding of essential public services, including health, policing, fire and rescue in the town, which would help to develop the defining role of a Service Centre, and felt that specific reference to these would be beneficial.

Members supported the avoidance of coalescence with adjacent settlements through the reconfirmation of Green Wedges as it allows for relevant extensions to those settlements whilst allowing them to retain their identity.

Members noted that the Quiet Area provision under DNP6 only applies to Penarth and wished to know why this was the case.

Members advised that they welcomed further opportunity for consultation, particularly in relation to developments in the neighbouring Cardiff Bay area whilst acknowledging that this is not necessarily an RLDP concern.

Footnotes

1 There is an evidence paper concerning relations with Cardiff and a Statement of Common Ground with Bridgend. However, there is only a reference in the RLDP text to discussions with other regional Councils and not the paper itself. We would be grateful if you could provide the paper as it does impact on the soundness of this Plan.

2The UK Climate Change Committee's 'Progress Report: Reducing Emissions in Wales' highlighted the following aspects of import: Skills, Vehicle Charging Networks, Improving Recycling, Energy Plans, Decarbonising Public Buildings and Social Housing, and reducing Road transport Demand (Car-Kilometres).

3The UK Environmental Audit Committee (2022) noted that "the evidence we received consistently recommended that retrofit and reuse be prioritised over new build."

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3d5

7019 Object

Document Element: Between Dinas Powys, Penarth

Respondent: Lidl GB Limited [1459]

Agent: CarneySweeney

Summary:

POLICY DNP2 – GREEN WEDGES

Lidl objects to the inclusion of land at Penlan Road, Llandough (see Site Location Plan, drawing no. 3744 F420) within the Green Wedge designation under Policy DNP2. The site forms a distinct and enclosed parcel of land on the north-eastern edge of the designated Green Wedge, and its physical characteristics demonstrate that it does not serve the strategic purposes of the wider designation.

The northern and western boundaries are formed by Llandough Hospital, including the hospital access road and surface car parking, which clearly separate the site from the wider Green Wedge. The southern boundary is defined by residential properties along Corbett Road and the Merrier Harrier public house. The south-western and western boundaries are formed by further residential properties within Llandough. As such, built development extends beyond the site in multiple directions, meaning it does not contribute to the open land between settlements that Green Wedges are intended to protect.

The site is physically and visually contained with strong, defensible boundaries. Its close association with existing built form means that it does not exhibit the level of openness required for Green Wedge designation under PPW or BP27. BP27 requires Green Wedge boundaries to include only land that must remain open in the long term. When assessed against the four-stage SE Wales Green Wedge methodology, the site performs weakly. In terms of openness (Stage A), the site has low perceived openness as it is enclosed by development. Under development pressure (Stage B), the influence of surrounding built form means the site is already urban in character. In relation to Green Wedge purposes (Stage C), the site does not materially contribute to preventing coalescence, safeguarding open countryside, or protecting the setting of an urban area. The conclusion (Stage D) is therefore that the site's inclusion within the Green Wedge is anomalous.

Recent decisions in the emerging RLDP, such as the allocation of HG1 KS2, demonstrate that selective Green Wedge boundary amendments are acceptable where supported by evidence. Not all areas within the current designation are equally sensitive, and the site represents one of the least sensitive parts.

The Council's own evidence further supports the suitability of the land for development. The site does not lie within the Special Landscape Area that covers much of the remaining Green Wedge, highlighting its lower landscape sensitivity. The Candidate Site Assessment (BP18a examined the wider parcel (Site ID 400) for housing and concluded that it would form a natural extension to the Llandough settlement boundary. It noted that the land would represent an incursion only if less sensitive sites could not be delivered and discounted the site solely because housing need had been met elsewhere, not due to landscape or Green Wedge harm. This confirms the Council recognises the land is capable of development. The same land can therefore appropriately meet other evidenced needs, including retail provision.

In separate representations, Lidl is promoting land to the south of Llandough Hospital via 'RDLP New site submissions'. It is considered that the site can be developed in a low-impact, landscape-led and sensitively designed manner that respects its transitional position between the urban edge and the wider Green Wedge. A modest single storey medium sized foodstore delivers a built form that can sit comfortably below surrounding tree lines and hospital structures. A comprehensive landscape strategy, including reinforced boundary planting, native woodland edge enhancement, and carefully designed building can soften building edges, strengthen the site's defensible boundaries, and integrate the scheme with its surroundings. The development would therefore appear as an infill of the existing urban area, rather than any intrusion into the open countryside, and can be designed to maintain the wider Green Wedge's openness and character by delivering a strong defensible physical boundary which prevents any further development beyond the site.

As set out in separate representations the Council's Retail and Leisure Study (BP13) identifies a clear quantitative and qualitative need for a medium to larger supermarket within Zone 5, alongside notable levels of convenience expenditure leakage to Zone 3 (Cardiff). The promoted site is well positioned to intercept this leakage, meet the identified convenience floorspace requirement, and provide improved local convenience retail provision for Llandough/Penarth. There is, therefore, a clear needs-based justification for release of this parcel of land from the Green Wedge designation.

Full text:

Draft RCS2 sets out three criteria for new A1, A2 or A3 uses on new sites or existing retail areas which are as follows:

1. "It can be demonstrated that there is an additional need for the proposal which cannot be provided within an existing retail, commercial and service centre; and
2. The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.
3. The proposal would serve local needs in a neighbourhood or rural village."

We consider the policy should read as follows:

"1 It can be demonstrated that there is an additional need for the proposal which, when applying the sequential approach to locating development as outlined in national guidance, it has been demonstrated that the site is sequentially preferable; and

2 The proposal would not either individually or cumulatively with other recent or proposed consented developments have an unacceptable impact on the trade, turnover, vitality and viability of the retail, commercial and service centres.

3 Proposals serving only local needs should be of a scale and type which does not undermine the vibrancy, attractiveness and viability of neighbourhood centres."

The settlement boundary, defined by Policy SP2, excludes allocation site SP12 'Land at Bridge House Farm, Llanmaes, Llantwit Major' which is for a retail foodstore. Instead, the draft allocation abuts, but lies outside, the settlement boundary as currently drawn. Although draft Policy SP3 states that "Areas outside settlement boundaries that are not allocated or protected for a specific use will be defined as countryside we consider the settlement boundary must be

extended at this location to include the allocation. Its exclusion is illogical and would fail to reflect the 'on the ground' position when this allocation is delivered. Moreover, its exclusion could confuse and may constrain any future minor development changes at the site (e.g. those needed to meet operational needs the subject of any planning application).
The draft proposals map shows the allocation as a dot which does not cover the full extent of the allocation. See below:
See plan in attachment
By not including the extent of the site/allocation within the defined settlement boundary, the draft plan fails to recognise the allocation will form an important part of the settlement, the delivery of which is crucial to meeting identified needs. Accordingly, we believe this fails Test 2 (Is the plan appropriate?), and it may fail Test 3 (Will the plan deliver) as its exclusion from the boundary may unduly impact the future site operation.

Lidl Great Britain Ltd objects to draft policy SP11 (Retail, commercial and service centre hierarchy) as worded as it fails to meet Test 2 (Is the plan appropriate?). Draft Policy SP11 sets out the proposed retail hierarchy (See extract below), but it does not accord with the settlement hierarchy as set out in draft Policy SP2 and it is not justified.
The adopted LDP Settlement Hierarchy lists:
Key Settlement: Barry
Service Centre Settlements: Cowbridge, Llantwit Major and Penarth
The adopted LDP Retail hierarchy lists:
Town centres: Barry
District centres: Barry (high street/broad street), Cowbridge, Llantwit Major, Penarth
Draft SP2 of the Deposit Plan identifies Cowbridge, Llantwit Major and Penarth as Service Centre Settlements in the Settlement Hierarchy.
However, draft SP11 lists a retail hierarchy as follows:
Town Centres – Barry (Holton Rd), Penarth, Cowbridge
District Centres – Barry (High Street), Llantwit Major
It is unexplained and unjustified that the SP11 retail hierarchy upgrades Cowbridge to Town Centre status, while Llantwit Major and Barry High Street remain District Centres.
The Deposit Plan includes two retail allocations, neither are intended to directly serve Penarth or Cowbridge. Cowbridge is not a focus for growth. It is therefore unjustified that Llantwit Major, which is served by a train station, is a settlement roughly twice the size of Cowbridge (by population) and is a manifestly more sustainable location and more appropriate focus for growth, is proposed to rank below Cowbridge in the retail hierarchy. Barry, Penarth and Llantwit Major should rank as Town Centres as the most sustainable locations for growth.
Penarth is an accessible settlement and an appropriate focus for growth. Indeed, the Council's BP13 (Retail and Commercial Leisure Study (June 2023)) recommends a medium to large supermarket to serve Penarth (Zone 5) but the Deposit Plan is absent of any food retail allocation for Penarth/Llandough. In addition to Llantwit Major and St Athan (Deposit Policy SP12) Penarth should be a focus for additional convenience provision over the plan period.

SP12 – RETAIL FLOORSPACE PROVISION
Lidl Great Britain Ltd firmly supports the allocation within draft Policy SP12 (Retail Floorspace Provision) for 1,251sqm of convenience floorspace at Land at Bridge House Farm, Llanmaes, Llantwit Major. This allocation is needed to ensure the plan is sound, by addressing unmet need at Llantwit Major which is a Service Centre and focus for growth. This should be made clear in the reasoned justification.
In respect to Penarth, Policy SP12, together with supporting paragraphs 6.208–6.210, do not, however, adequately reflect the findings of the Council's Retail & Leisure Study (BP13). Policy SP12 should also plan positively for the identified convenience retail needs within Zone 5 (Penarth/ Llandough). BP13 confirms that Penarth District Centre is not served by a medium to larger supermarket (para. 9.2). The BP13 Study finds quantitative and qualitative capacity for a medium to larger supermarket by 2036 in Penarth (paras. 9.23, 12.24).
It finds overall quantitative convenience capacity of up to c.5,862sqm net floorspace (assuming deep discounter operators). In qualitative terms the following Centres have been identified in potential need for a medium to larger supermarket: Barry Holton Road town centre; Penarth district centre and Llantwit Major district centre. Quantitative and qualitative need is identified.
Despite the evidence of unmet need, the Deposit LDP Policy SP12 allocates only two sites for convenience retail totalling c. 3,109sqm net; one site at Llanwit Major and a second site at St Athan. This is below the overall (up to 4,282–5,862sqm net) requirement identified in BP13. The allocation of land at Llantwit Major aligns with the evidence base, has been thoroughly tested at application stage and this is fully supported.
Policy SP12 is silent on the need for additional floorspace at Penarth/Llandough (Zone 5) and as such does not reflect the evidence base findings and address identified need in Penarth, with a 'residual' quantitative capacity of c.1,173–2,753sqm net unmet/unallocated. We note Policy SP12 states that any additional convenience and comparison retail floorspace beyond that provided by the identified sites should be directed towards the town and district centres outlined in Policy SP11. However, this merely reflects national guidance in respect to directing growth to town/district centres (i.e. applying a sequential approach). The Policy should go further and seek to allocate the residual unmet need to Penarth/ Llandough. We note the BP13 is silent on additional need at St Athan.
Planning Policy Wales (PPW) 12 requires LPAs to identify the appropriate form, scale and location to meet retail needs (para. 4.3.8) and emphasises ensuring communities have access to adequate retail provision (para. 4.3.13). PPW therefore places a duty on LPAs to plan positively for evidenced retail needs. In respect to Penarth/Llandough Policy SP12 should seek to address this requirement.
Under PPW and TAN4, LPAs must apply the sequential test, directing new retail development to locations that are:
• In-centre,
• Edge-of-centre, and only then,

• Out-of-centre locations that are accessible and well-connected to the catchment.
Penarth Centre is physically constrained. In the absence of any in-centre or edge-of-centre sites capable of accommodating a medium/larger supermarket, the next sequentially preferable option is the most accessible, well-connected site within the same catchment, capable of meeting identified need and reducing expenditure leakage.
Policy SP12 should plan positively for needs in Zone 5 (Penarth/Llandough) and include provision for a medium to large convenience foodstore in Zone 5 in accordance with BP13.
Enclosed with this representation is a separate representation (Under 8. New site submission) promoting a site for food retail development to meet identified needs within the Zone 5 Penarth/Llandough catchment. The site is considered accessible and sequentially preferable to meeting identified needs in Penarth.
The policy should be clear that identified need should be delivered in accordance with the sequential approach as set out in national guidance. As set out in Policy SP12 any additional convenience and comparison retail floorspace beyond that provided by identified sites should be directed towards the town and district centres in accordance with the sequential approach. We support that the inclusion of retail floorspace as part of a mix of uses on allocated sites will also be supported.

POLICY DNP2 – GREEN WEDGES
Lidl objects to the inclusion of land at Penlan Road, Llandough (see Site Location Plan, drawing no. 3744 F420) within the Green Wedge designation under Policy DNP2. The site forms a distinct and enclosed parcel of land on the north-eastern edge of the designated Green Wedge, and its physical characteristics demonstrate that it does not serve the strategic purposes of the wider designation.
The northern and western boundaries are formed by Llandough Hospital, including the hospital access road and surface car parking, which clearly separate the site from the wider Green Wedge. The southern boundary is defined by residential properties along Corbett Road and the Merrier Harrier public house. The south-western and western boundaries are formed by further residential properties within Llandough. As such, built development extends beyond the site in multiple directions, meaning it does not contribute to the open land between settlements that Green Wedges are intended to protect.
The site is physically and visually contained with strong, defensible boundaries. Its close association with existing built form means that it does not exhibit the level of openness required for Green Wedge designation under PPW or BP27. BP27 requires Green Wedge boundaries to include only land that must remain open in the long term. When assessed against the four-stage SE Wales Green Wedge methodology, the site performs weakly. In terms of openness (Stage A), the site has low perceived openness as it is enclosed by development. Under development pressure (Stage B), the influence of surrounding built form means the site is already urban in character. In relation to Green Wedge purposes (Stage C), the site does not materially contribute to preventing coalescence, safeguarding open countryside, or protecting the setting of an urban area. The conclusion (Stage D) is therefore that the site's inclusion within the Green Wedge is anomalous.
Recent decisions in the emerging RLDP, such as the allocation of HG1 KS2, demonstrate that selective Green Wedge boundary amendments are acceptable where supported by evidence. Not all areas within the current designation are equally sensitive, and the site represents one of the least sensitive parts.
The Council's own evidence further supports the suitability of the land for development. The site does not lie within the Special Landscape Area that covers much of the remaining Green Wedge, highlighting its lower landscape sensitivity. The Candidate Site Assessment (BP18a examined the wider parcel (Site ID 400) for housing and concluded that it would form a natural extension to the Llandough settlement boundary. It noted that the land would represent an incursion only if less sensitive sites could not be delivered and discounted the site solely because housing need had been met elsewhere, not due to landscape or Green Wedge harm. This confirms the Council recognises the land is capable of development. The same land can therefore appropriately meet other evidenced needs, including retail provision.
In separate representations, Lidl is promoting land to the south of Llandough Hospital via 'RDLP New site submissions'. It is considered that the site can be developed in a low-impact, landscape-led and sensitively designed manner that respects its transitional position between the urban edge and the wider Green Wedge. A modest single storey medium sized foodstore delivers a built form that can sit comfortably below surrounding tree lines and hospital structures. A comprehensive landscape strategy, including reinforced boundary planting, native woodland edge enhancement, and carefully designed building can soften building edges, strengthen the site's defensible boundaries, and integrate the scheme with its surroundings. The development would therefore appear as an infill of the existing urban area, rather than any intrusion into the open countryside, and can be designed to maintain the wider Green Wedge's openness and character by delivering a strong defensible physical boundary which prevents any further development beyond the site.
As set out in separate representations the Council's Retail and Leisure Study (BP13) identifies a clear quantitative and qualitative need for a medium to larger supermarket within Zone 5, alongside notable levels of convenience expenditure leakage to Zone 3 (Cardiff). The promoted site is well positioned to intercept this leakage, meet the identified convenience floorspace requirement, and provide improved local convenience retail provision for Llandough/Penarth. There is, therefore, a clear needs-based justification for release of this parcel of land from the Green Wedge designation.
The Green Wedge boundary should be amended at this location to remove the promoted site from Policy DNP2 (Green Wedge designation) and from the Proposals Map. In parallel, the settlement boundary defined by Policy SP2 should be realigned to include the promoted site, reflecting the site's physical relationship with existing development, its defensible boundaries, and its suitability to meet an evidenced strategic retail need.

The Policy text should be changed as follows:

"Proposals involving the change of use at ground floor level uses from A1 retail use within Service Centres will permitted where the proposal would:…"
The Policy RCS1 (Resilient retail, commercial and service centres) supporting text adds new policy requirements which are not within the draft policy. Paragraph 6.214 states that:
"Changes of use class in Retail, Commercial and Service Centres must be justified by evidence that the property has been affected by a sustained period of long-term vacancy and that proactive marketing has been undertaken by a property agent for a minimum of 12 months in an effort to secure tenants. The marketing report should include:
• Details of the existing use or previous use if vacant;
• The length of time the unit has been vacant, if applicable;
• The type of use which the unit has been marketed for, what the marketing strategy involved and its duration;
• The amount of interest in the unit during the marketing period – this should detail the number of queries, the type of uses sought, and if known, the reason for not pursuing any initial enquiries."
However, nowhere in the draft policy wording does it explicitly state to include 12 months of marketing activity. The draft supporting text reads as though this is a policy requirement, rather than supportive guidance. This is contrary to caselaw which confirms that supporting text cannot be used to expand the policy beyond its wording (R (Cherkley Campaign Ltd) v Mole Valley District Council). A proposal could meet the requirements of the criteria sets out in draft policy RCS1 without being marketed for a minimum of 12 months. If the Plan is adopted as currently set out, there is a risk of internal inconsistency between policy RSC1 and the supporting text. Accordingly, this would fail Test 2 (Is the plan appropriate?) as it is not coherent or consistent.
We also have concerns with criterion 5 which states to "Avoid an over-concentration of non-retail uses that would undermine the retail function of the centre". This is because 'over-concentration' has not been defined within the draft policy. This contrasts with draft policy RCS3 which includes a definition of what an over-concentration of hot food takeaways would be. Without a definition of what an over-concentration of non-retail uses is, the draft policy will remain and lack clarity. Additionally, without a definition, the draft policy may fail Tests 2 and 3 as it is currently unclear (Test 2: Is the plan appropriate?) and cannot be effective (Test 3: Will the plan deliver?).

At present, we consider the Deposit Plan inadequately supports the Welsh language. Although the Welsh Language is included within Objective 6 (Embracing Culture and Heritage), the Deposit Plan does not contain a policy which seeks to promote the Welsh language, nor is the promotion of the Welsh language referenced in other Deposit Plan policies where this may be appropriate. Without a clear policy, applicants do not need to explicitly consider impact on the Welsh language so the role of the RLDP will be limited.
Local Development Plans should accord with national policy and guidance. For instance, the supporting text to Policy 1 of Future Wales states that "Key issues, including … the Welsh language, are core elements of policy 1 and are common threads underpinning all Future Wales policies." However, we believe that the Welsh language is not currently underpinning the policies within the Deposit Plan.
Additionally, paragraph 3.25 of PPW states that "The Welsh language is part of the social and cultural fabric and its future well being will depend upon a wide range of factors, particularly education, demographic change, community activities and a sound economic base to maintain thriving sustainable communities and places. The land use planning system should take account of the conditions which are essential to the Welsh language and in so doing contribute to its, use and the Thriving Welsh Language well being goal." Paragraph 3.29 goes on to suggest language impact assessments are required for "large developments not allocated in a development plan which are proposed in areas of particular sensitivity or importance for the language" with these areas defined in the LDP. In this instance, PPW sets out guidance for developers which is not present in the Deposit Plan.
The Vale of Glamorgan Council commissioned AECOM to produce the Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan (November 2025). Paragraph 9.5.9 recommends including a specific policy that supports and protects the Welsh language within the Deposit Plan. This contrasts with the Welsh Language (November 2025) Background paper, produced by the VoGC, which concludes that a specific Welsh Language policy is not warranted, albeit it does acknowledge the Plan's statutory duty to consider the Welsh language and embed relevant provisions within broader thematic policies. However, this is currently lacking as the Deposit Plan does not reference the Welsh language within other policies. Although the Background Paper considers that the RLDP is "unlikely to adversely affect the existing patterns of Welsh language use within the Vale of Glamorgan", the Plan should seek to promote the Welsh language.
Developers should be encouraged to promote the Welsh language where this may be reasonable and appropriate e.g. bilingual signage and announcements. Lidl actively promotes the Welsh language through their business. The Deposit Plan should be amended to strengthen the importance of the Welsh language, helping to meet Objective 6 over the RLDP period. Overall, without clear Welsh Language policy promotion, the Deposit Plan cannot positively impact the Welsh language. The Deposit Plan needs to go further.

Change suggested by respondent:

The Green Wedge boundary should be amended at this location to remove the promoted site from Policy DNP2 (Green Wedge designation) and from the Proposals Map. In parallel, the settlement boundary defined by Policy SP2 should be realigned to include the promoted site, reflecting the site's physical relationship with existing development, its defensible boundaries, and its suitability to meet an evidenced strategic retail need.

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rm
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rn
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4ry

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rp
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4rq
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/4sr

7021 Support

Document Element: Between Llantwit Major and
Respondent: Mrs Linda Green [1072]

Summary:

I support the proposal of a green wedge.

Full text:

I strongly object to the development of this field which is a natural border between the rural settlement of Llanmaes and the town of Llantwit Major. Development in this open countryside area and next to the llanmaes conservation area is against Welsh planning policy, and coalescence of town and village should be avoided.
I support the proposal of a green wedge

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

7055 Object

Document Element: Between Llantwit Major and
Respondent: Mr and Mrs Merchant [3736]
Agent: Geraint John Planning Ltd

Summary:

We object to the green wedge designation between Llantwit Major and Llanmaes, specifically the inclusion of the West Croft site.
It is considered the assessment for this green wedge is not soundly based. The decision to include the West Croft site is not justified given its clear relationship with the village and the absence of development pressure. A more appropriate, evidence-led boundary is therefore put forward, following clear defensible physical features by adjusting the northern edge of the Green Wedge to correspond with Llanmaes Brook.

Full text:

As part of the Deposit Plan, updated Proposals and Constraints Maps have been published by the Council. The Deposit Plan Proposals Map sets out the Vale of Glamorgan's green wedge designations. For context, a number of Green Wedge designations (7 in total) are made by the existing adopted LDP (the Development Plan). The Deposit Plan Proposals Map sets out that the Vale of Glamorgan Council proposes a designated Green Wedge between Llantwit Major and Llanmaes, accordingly, one of 2 new / additional green wedges (responding to submissions made through the RLDP Candidate Site Process). For ease of reference, an extract of the relevant Proposals Map is provided below:

Deposit Plan Proposals Map

Alongside the Proposals Map, the Deposit Plan RLDP Written Statement sets out and includes Policy DNP2 (Green Wedges) which states the following:

"Green wedges have been identified to prevent the coalescence of settlements and to retain the openness of land at the following locations:
1. Between Dinas Powys, Penarth and Llandough;
2. North West of Sully;
3. North of Wenvoe;
4. Between Barry and Rhoose;
5. South Penarth to Sully; and
6. Between Llantwit Major and Llanmaes.
Within these areas development which prejudices the open nature of the land will not be permitted."

The subtext to the policy also sets out the following:

"6.417. Therefore, within the areas defined by the green wedges there will be a presumption against inappropriate development19 which would contribute to urban coalescence, prejudice the open nature of the land, or have an adverse impact upon the setting of an urban area. In applying this protection, however, it is recognised that individual or small groups of dwellings exist within the designations and that activities such as agriculture, forestry and recreation, occur. Consequently, development associated with existing uses will be limited to minor structures which are strictly ancillary to existing uses. Details of each of the designations are contained within the Green Wedge Background Paper".

These Representations (Objections)

We appreciate the intention of the Llanmaes and Llantwit Major green wedge is to “prevent the coalescence of settlements and to retain the openness of land” – in this case and instance Llantwit Major and Llanmaes.

Whilst we do not raise objection to the designation of a Green Wedge per se (i.e. an outright objection to the principle and / or extent of some of the designation proposed) we do object to the particular extent of, and precise definition of, its extent. Accordingly, our clients’ representations seek to omit their land ‘West Croft, Llanmaes’ from the proposed Green Wedge, for the reasons set out below, and evidenced as follows.

Again, and for clarity, our client’s property extends to the following:
Aerial image of our client’s site (outlined in red)

The clients land relative to the proposed green wedge designation is shown more precisely and closely by the following extract from the proposals map.

In terms of evidence behind the inferred designation, importantly, the Green Wedges Background Paper (BP27) November 2025 sets out the following guidance on Green Wedge designations, paragraph 2.5. states “Planning Policy Wales Edition 12 (February 2024) (PPW) advises that green wedges must be soundly based and should only be employed where there is a demonstrable need to protect the urban form and alternative policy mechanisms, such as settlement boundaries, would not be sufficiently robust.” (GJP emphasis).
In respect to the detailed assessment of the case for designation of a / the Green Wedge between Llantwit Major and Llanmaes in the Vale of Glamorgan Green Wedge Assessment, in Stage B: Assessment of development pressure, the following is recorded / set out: “With the exception of the recent retail application detailed below, there is no significant general development pressure identified within the area proposed for a green wedge other than applications associated with agricultural practices, householder applications, flood defence and previous Defence Training Academy proposals”. This clearly records that “there is no significant general development pressure identified”.

Furthermore, the Green Wedges Background Paper (BP27) sets out in paragraph 2.3, “Green Wedges are local designations which serve as an urban containment mechanism intended to restrict the spread of built development beyond designated settlement boundaries and allocated development sites. Where designated, they comprise the open areas around, and between, parts of settlements and seek to maintain the distinction between the countryside and built-up areas and prevent urban coalescence. Their designation, although non-statutory, adds an additional layer of protection to those areas where it is considered that development pressure exists or will exist during the lifetime of a development plan”. Given the minimal development pressure identified above, it is therefore difficult to justify the need for an urban containment mechanism in this location.

Given this, it is questioned as to whether the designation is necessary as the B4265 provides an adequate and sufficient barrier to development north of the by-pass – which is designated as ‘countryside’ and does not adjoin a/the settlement boundary (to either Llantwit Major and / or Llanmaes), and is significantly protected in policy terms as a result.

It is clear and evident that Llanmaes, and by association the clients land is separated from Llantwit Major by not only the significant corridor of the ‘by-pass’, but also a significant and mature tree belt that follows the course of the watercourse running in an east-west direction, this is depicted by the following annotated aerial photograph:
Defensible Boundaries between Llantwit Major and Llanmaes

Paragraph 2.6 sets out the “Vale of Glamorgan has incorporated green wedge policy and designations in multiple development plans over many years to protect the openness or countryside and settings of urban areas” (GJP emphasis). Given our client’s land is directly adjoining the settlement boundary, and visually and functionally associated with the built form of the village, the land does not exhibit the characteristics of the open countryside. The site forms part of the curtilage of the West Croft property, and appears as a continuation of the village. In contrast, the land to the south of Llanmaes Brook displays a clear rural character and represents genuine open countryside. As such, the inclusion of the West Croft land is not warranted, as the intended function of the Green Wedge - to protect the countryside, can be achieved without its inclusion.

The Vale of Glamorgan Green Wedge Assessment assessed the Llantwit Major to Llanmaes wedge as having a “strong distinction from the urban area”. However, this characterisation does not apply to the specific context of the West Croft parcel of land. Given its direct relationship with the built form, both to the north and south, it cannot reasonably be concluded that this land provides a “strong” degree of separation between settlement and countryside.

For these reasons, the justification for including the West Croft land within the Green Wedge is not supported by guidance set out in PPW and the Green Wedge Background Paper. The designation of this parcel is therefore strongly questioned.
Furthermore, Step 18 of the Green Wedge Assessment seeks to ‘Determine whether outer boundary should be adjusted in order to use clear boundary features, or to simplify its form’. Paragraph 3.5. of the Green Wedges Background Paper (BP27) reiterates the PPW guidance for defining green wedges “boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term”. In respect to the

Llantwit Major and Llanmaes green wedge, it was considered in the assessment that the wedge should "Use Llanmaes Brook which forms the southern edge of the existing Conservation Area boundary as the northern boundary of most of the green wedge to the southeast". This suggested alignment is set out in a plan within the assessment – 'comparing and contrasting' the candidate site (suggested) Green Wedge boundary with the assessed and considered boundary, which has been extracted below for reference:
Compare and Contrast of Proposed Green Wedge and Candidate Site Green Wedge
It is important to note that this suggested alignment recommends the omission of the objectors (our client's) land from the designation:
A further comment is passed in the assessment, setting out that "It probably doesn't really matter if Conservation area and green wedge cover same area. Therefore may be more appropriate to include land to east of Llanmaes Road (both areas of blue line)." For context, the Llanmaes Conservation Area boundary is defined as follows:
Llanmaes Conservation Area

It is relevant and important to note from the assessment of the nearby proposed other Green Wedge designation – Land between the B4265 and Boverton – that the following position was taken in respect to the presence of a Conservation Area in the case "there are several constraints which are considered to prejudice future designation as a green wedge, not least, the inclusion of the land within the Boverton Conservation Area boundary".

In this case, the Conservation Area was clearly a key factor and contributor (alongside lack of development pressure, as is the case in the Llantwit Major to Llanmaes green wedge) that led to the case for designation of a Green Wedge in that instance and location being rejected, the overall conclusion in that case being that "the land does not warrant the additional protection provided by a green wedge designation and that the existing and emerging policy suite of the adopted Local Development Plan and the Replacement Local Development Plan could adequately prevent inappropriate development on the land." Given this, and in the interests of consistency, the boundary of the proposed Green Wedge in this case ought to be revised in order to omit the parcel that falls within the Conservation Area boundary – as assessed by the Green Wedge Background Paper.

Summary
The omission of our clients site 'West Croft' from the proposed Green Wedge is both evidence based and consistent with the guidance set out by PPW. As such, the revised boundary running adjacent to Llanmaes Brook and the associated vegetation, represents a more robust, defensible, and policy compliant Green Wedge designation.

The following plan depicts a considered more evident and policy compliant extent to any Green Wedge designation:
Proposed Alteration to the Green Wedge

Summary and Conclusion of these Deposit Representations / Objections

In summary, these representations to the Deposit Plan object to the green wedge designation between Llantwit Major and Llanmaes, specifically the inclusion of the West Croft site.

It is considered the assessment for this green wedge is not soundly based. As set out above, the decision to include the West Croft site is not justified given its clear relationship with the village and the absence of development pressure. A more appropriate, evidence-led boundary is therefore put forward, following clear defensible physical features by adjusting the northern edge of the Green Wedge to correspond with Llanmaes Brook.

Given the detailed nature of this representation our clients would be happy to discuss any aspect of this letter when your Authority comes to evaluate the content.

We look forward to hearing from you in due course. In the meantime, however, we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Change suggested by respondent:
Change to Green Wedge boundary.

Sound: Not specified

Attachments:
Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3gf
Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3gx

7178 Object

Document Element: Between Llantwit Major and
Respondent: Anthony Cowling [3739]
Agent: Geraint John Planning Ltd

Summary:

These representations to the Deposit Plan object to the green wedge designation between Llantwit Major and Llanmaes, specifically the inclusion of the 'Glebelands at Llanmaes' site.
It is considered the assessment for this green wedge is not soundly based. The decision to include the Glebelands site is not justified given that the intentions of the green wedge can be maintained with the omission of our clients site. A more appropriate, evidence-led boundary is therefore put forward, following clear defensible physical features by adjusting the northern edge of the Green Wedge to correspond with Llanmaes Brook.

Full text:

Representations regarding (objections to) the proposed designation of a Green Wedge between Llantwit Major and Llanmaes

Please find enclosed, on behalf of and under instruction from our client, 'Representative Body of the Church in Wales (RBCW)'; 'Ms Rhian Reid' and 'Mr Anthony John Cowling', representations for consideration as part of Vale of Glamorgan's RLDP Deposit Plan.

Context to these Representations

This submission comments on the Deposit Plan, specifically the proposed designation of a Green Wedge between Llantwit Major and Llanmaes, this designation includes our client's site 'Glebelands at Llanmaes', which for clarity extends to the following:

Aerial image of our client's site (outlined in red)

The site is divided into three parcel's, each under separate client ownership. For context, the site ownership plan is provided below.

Aerial image of our client's site (outlined in red and yellow)

Parcel Owner
Parcel 1 Representative Body of the Church in Wales (RBCW)
Parcel 2 Ms Rhian Reid
Parcel 3 Mr Anthony John Cowling

The Green Wedge

As part of the Deposit Plan, updated Proposals and Constraints Maps have been published by the Council. The Deposit Plan Proposals Map sets out the Vale of Glamorgan's green wedge designations. For context, a number of Green Wedge designations (7 in total) are made by the existing adopted LDP (the Development Plan). The Deposit Plan Proposals Map sets out that the Vale of Glamorgan Council proposes a designated Green Wedge between Llantwit Major and Llanmaes, accordingly, one of 2 new / additional green wedges (responding to submissions made through the RLDP Candidate Site Process). For ease of reference, an extract of the relevant Proposals Map is provided overleaf:

Deposit Plan Proposals Map

Alongside the Proposals Map, the Deposit Plan RLDP Written Statement sets out and includes Policy DNP2 (Green Wedges) which states the following:

"Green wedges have been identified to prevent the coalescence of settlements and to retain the openness of land at the following locations:
1. Between Dinas Powys, Penarth and Llandough;
2. North West of Sully;
3. North of Wenvoe;
4. Between Barry and Rhoose;
5. South Penarth to Sully; and
6. Between Llantwit Major and Llanmaes.
Within these areas development which prejudices the open nature of the land will not be permitted."

The subtext to the policy also sets out the following:

"6.417. Therefore, within the areas defined by the green wedges there will be a presumption against inappropriate development19 which would contribute to urban coalescence, prejudice the open nature of the land, or have an adverse impact upon the setting of an urban area. In applying this protection, however, it is recognised that individual or small groups of dwellings exist within the designations and that activities such as agriculture, forestry and recreation, occur. Consequently, development associated with existing uses will be limited to minor structures which are strictly ancillary to existing uses. Details of each of the designations are contained within the Green Wedge Background Paper".

These Representations (Objections)

We appreciate the intention of the Llanmaes and Llantwit Major green wedge is to “prevent the coalescence of settlements and to retain the openness of land” – in this case and instance Llantwit Major and Llanmaes.

Whilst we do not raise objection to the designation of a Green Wedge per se (i.e. an outright objection to the principle and / or extent of some of the designation proposed) we do object to the particular extent of, and precise definition of, its extent. Accordingly, our clients’ representations seek to omit their land ‘Glebelands at Llanmaes’ from the proposed Green Wedge, for the reasons set out below, and evidenced as follows.

Again, and for clarity, our client’s ownership site plan is provided below:

Aerial image of our client’s site

Our clients land relative to the proposed green wedge designation is shown more precisely and closely by the following extract from the proposals map.

‘Zoomed in’ Deposit Plan Proposals Map (approx. site location outlined in red)

As Policy DNP2 (Green Wedges) of the Deposit Plan RLDP Written Statement sets out, the intention of a Green Wedge designation, as per PPW guidance, is to “prevent the coalescence of settlements”, which in this case is to prevent the coalescence between Llantwit Major and Llanmaes. Whilst we fully appreciate the Vale of Glamorgan’s intentions to prevent the urban coalescence of these two settlements, we question the necessity of including the Glebelands site within the proposed Green Wedge boundary.

Step 18 of the Green Wedge Assessment seeks to ‘Determine whether outer boundary should be adjusted in order to use clear boundary features, or to simplify its form’. Paragraph 3.5. of the Green Wedges Background Paper (BP27) reiterates the PPW guidance for defining green wedges “boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term”. In respect to the Llantwit Major and Llanmaes green wedge, the assessment itself acknowledges that the designation should “Use Llanmaes Brook which forms the southern edge of the existing Conservation Area boundary as the northern boundary of most of the green wedge to the southeast”.

Given this, it is questioned as to why the designation extends northwards beyond the Llanmaes Brook. There are already clear, distinguishable physical features – including the B4265 and the Llanmaes Brook (illustrated on the image below). These physical features are adequate and sufficient barriers to development north of the by-pass – which is designated as ‘countryside’ and does not adjoin a/the settlement boundary (to either Llantwit Major and / or Llanmaes) and is significantly protected in policy terms as a result.

Defensible Boundaries between Llantwit Major and Llanmaes

Key
Extensive strong woodland belt along and following watercourse
Extensive road corridor

In this context, the designation of the Glebelands site as part of the Green Wedge extends the boundary into an area where there is no demonstrable need for additional restriction, and where the stated purpose of preventing coalescence is already being met by existing physical features and policy context. We therefore propose the following Green Wedge between Llantwit Major and Llanmaes, which depicts a considered, more evidence-based extent to any Green Wedge designation:

Proposed Alteration to the Green Wedge

The above Green Wedge clearly maintains the intentions of the Green Wedge between Llantwit Major and Llanmaes to “prevent the coalescence of settlements” whilst “using physical features and boundaries to include only that land which it is necessary to keep open in the longer term”.

Accordingly, this refined extent would follow clear physical features whilst still fully achieving the intentions of the wedge, and avoiding the unjustified inclusion of the Glebelands site. For these reasons, we maintain that the Glebelands site should be excluded from the proposed Green Wedge designation.

Summary
The omission of our clients site ‘Glebelands at Llanmaes’ from the proposed Green Wedge is both evidence-based and consistent with the guidance set out by PPW. As such, the revised boundary running adjacent to Llanmaes Brook and the associated vegetation, represents a more robust, defensible, and policy compliant Green Wedge designation.

The following plan depicts a considered more evident and policy compliant extent to any Green Wedge designation:

Proposed Alteration to the Green Wedge

Summary and Conclusion of these Deposit Representations / Objections

In summary, these representations to the Deposit Plan object to the green wedge designation between Llantwit Major and Llanmaes, specifically the inclusion of the 'Glebelands at Llanmaes' site.

It is considered the assessment for this green wedge is not soundly based. As set out above, the decision to include the Glebelands site is not justified given that the intentions of the green wedge can be maintained with the omission of our clients site. A more appropriate, evidence-led boundary is therefore put forward, following clear defensible physical features by adjusting the northern edge of the Green Wedge to correspond with Llanmaes Brook.

Given the detailed nature of this representation our clients would be happy to discuss any aspect of this letter when your Authority comes to evaluate the content.

We look forward to hearing from you in due course. In the meantime, however, we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3zg
Email representation redacted - https://valeofglamorgan.oc2.uk/a/3ps

7179 Object

Document Element: Between Llantwit Major and
Respondent: Representative Body of the Church in Wales [1180]
Agent: Geraint John Planning Ltd

Summary:

These representations to the Deposit Plan object to the green wedge designation between Llantwit Major and Llanmaes, specifically the inclusion of the 'Glebelands at Llanmaes' site.
It is considered the assessment for this green wedge is not soundly based. The decision to include the Glebelands site is not justified given that the intentions of the green wedge can be maintained with the omission of our clients site. A more appropriate, evidence-led boundary is therefore put forward, following clear defensible physical features by adjusting the northern edge of the Green Wedge to correspond with Llanmaes Brook.

Full text:

Representations regarding (objections to) the proposed designation of a Green Wedge between Llantwit Major and Llanmaes

Please find enclosed, on behalf of and under instruction from our client, 'Representative Body of the Church in Wales (RBCW)'; 'Ms Rhian Reid' and 'Mr Anthony John Cowling', representations for consideration as part of Vale of Glamorgan's RLDP Deposit Plan.

Context to these Representations

This submission comments on the Deposit Plan, specifically the proposed designation of a Green Wedge between Llantwit Major and Llanmaes, this designation includes our client's site 'Glebelands at Llanmaes', which for clarity extends to the following:

Aerial image of our client's site (outlined in red)

The site is divided into three parcel's, each under separate client ownership. For context, the site ownership plan is provided below.

Aerial image of our client's site (outlined in red and yellow)

Parcel Owner
Parcel 1 Representative Body of the Church in Wales (RBCW)
Parcel 2 Ms Rhian Reid
Parcel 3 Mr Anthony John Cowling

The Green Wedge

As part of the Deposit Plan, updated Proposals and Constraints Maps have been published by the Council. The Deposit Plan Proposals Map sets out the Vale of Glamorgan's green wedge designations. For context, a number of Green Wedge

designations (7 in total) are made by the existing adopted LDP (the Development Plan). The Deposit Plan Proposals Map sets out that the Vale of Glamorgan Council proposes a designated Green Wedge between Llantwit Major and Llanmaes, accordingly, one of 2 new / additional green wedges (responding to submissions made through the RLDP Candidate Site Process). For ease of reference, an extract of the relevant Proposals Map is provided overleaf:

Deposit Plan Proposals Map

Alongside the Proposals Map, the Deposit Plan RLDP Written Statement sets out and includes Policy DNP2 (Green Wedges) which states the following:

"Green wedges have been identified to prevent the coalescence of settlements and to retain the openness of land at the following locations:
1. Between Dinas Powys, Penarth and Llandough;
2. North West of Sully;
3. North of Wenvoe;
4. Between Barry and Rhoose;
5. South Penarth to Sully; and
6. Between Llantwit Major and Llanmaes.
Within these areas development which prejudices the open nature of the land will not be permitted."

The subtext to the policy also sets out the following:

"6.417. Therefore, within the areas defined by the green wedges there will be a presumption against inappropriate development19 which would contribute to urban coalescence, prejudice the open nature of the land, or have an adverse impact upon the setting of an urban area. In applying this protection, however, it is recognised that individual or small groups of dwellings exist within the designations and that activities such as agriculture, forestry and recreation, occur. Consequently, development associated with existing uses will be limited to minor structures which are strictly ancillary to existing uses. Details of each of the designations are contained within the Green Wedge Background Paper".

These Representations (Objections)

We appreciate the intention of the Llanmaes and Llantwit Major green wedge is to "prevent the coalescence of settlements and to retain the openness of land" – in this case and instance Llantwit Major and Llanmaes.

Whilst we do not raise objection to the designation of a Green Wedge per se (i.e. an outright objection to the principle and / or extent of some of the designation proposed) we do object to the particular extent of, and precise definition of, its extent. Accordingly, our clients' representations seek to omit their land 'Glebelands at Llanmaes' from the proposed Green Wedge, for the reasons set out below, and evidenced as follows.

Again, and for clarity, our client's ownership site plan is provided below:

Aerial image of our client's site

Our clients land relative to the proposed green wedge designation is shown more precisely and closely by the following extract from the proposals map.

'Zoomed in' Deposit Plan Proposals Map (approx. site location outlined in red)

As Policy DNP2 (Green Wedges) of the Deposit Plan RLDP Written Statement sets out, the intention of a Green Wedge designation, as per PPW guidance, is to "prevent the coalescence of settlements", which in this case is to prevent the coalescence between Llantwit Major and Llanmaes. Whilst we fully appreciate the Vale of Glamorgan's intentions to prevent the urban coalescence of these two settlements, we question the necessity of including the Glebelands site within the proposed Green Wedge boundary.

Step 18 of the Green Wedge Assessment seeks to 'Determine whether outer boundary should be adjusted in order to use clear boundary features, or to simplify its form'. Paragraph 3.5. of the Green Wedges Background Paper (BP27) reiterates the PPW guidance for defining green wedges "boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term". In respect to the Llantwit Major and Llanmaes green wedge, the assessment itself acknowledges that the designation should "Use Llanmaes Brook which forms the southern edge of the existing Conservation Area boundary as the northern boundary of most of the green wedge to the southeast".

Given this, it is questioned as to why the designation extends northwards beyond the Llanmaes Brook. There are already clear, distinguishable physical features – including the B4265 and the Llanmaes Brook (illustrated on the image below). These physical features are adequate and sufficient barriers to development north of the by-pass – which is designated as 'countryside' and does not adjoin a/the settlement boundary (to either Llantwit Major and / or Llanmaes) and is significantly protected in policy terms as a result.

Defensible Boundaries between Llantwit Major and Llanmaes

Key
Extensive strong woodland belt along and following watercourse
Extensive road corridor

In this context, the designation of the Glebelands site as part of the Green Wedge extends the boundary into an area where there is no demonstrable need for additional restriction, and where the stated purpose of preventing coalescence is already being met by existing physical features and policy context. We therefore propose the following Green Wedge between Llantwit Major and Llanmaes, which depicts a considered, more evidence-based extent to any Green Wedge designation:

Proposed Alteration to the Green Wedge

The above Green Wedge clearly maintains the intentions of the Green Wedge between Llantwit Major and Llanmaes to "prevent the coalescence of settlements" whilst "using physical features and boundaries to include only that land which it is necessary to keep open in the longer term".

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The omission of our clients site 'Glebelands at Llanmaes' from the proposed Green Wedge is both evidence-based and consistent with the guidance set out by PPW. As such, the revised boundary running adjacent to Llanmaes Brook and the associated vegetation, represents a more robust, defensible, and policy compliant Green Wedge designation.

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Summary and Conclusion of these Deposit Representations / Objections

In summary, these representations to the Deposit Plan object to the green wedge designation between Llantwit Major and Llanmaes, specifically the inclusion of the 'Glebelands at Llanmaes' site.

It is considered the assessment for this green wedge is not soundly based. As set out above, the decision to include the Glebelands site is not justified given that the intentions of the green wedge can be maintained with the omission of our clients site. A more appropriate, evidence-led boundary is therefore put forward, following clear defensible physical features by adjusting the northern edge of the Green Wedge to correspond with Llanmaes Brook.

Given the detailed nature of this representation our clients would be happy to discuss any aspect of this letter when your Authority comes to evaluate the content.

We look forward to hearing from you in due course. In the meantime, however, we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3zk
Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pt

7180 Object

Document Element: Between Llantwit Major and
Respondent: Rhian Reid [3740]
Agent: Geraint John Planning Ltd

Summary:

These representations to the Deposit Plan object to the green wedge designation between Llantwit Major and Llanmaes, specifically the inclusion of the 'Glebelands at Llanmaes' site.
It is considered the assessment for this green wedge is not soundly based. The decision to include the Glebelands site is not justified given that the intentions of the green wedge can be maintained with the omission of our clients site. A more appropriate, evidence-led boundary is therefore put forward, following clear defensible physical features by adjusting the northern edge of the Green Wedge to correspond with Llanmaes Brook.

Full text:

Representations regarding (objections to) the proposed designation of a Green Wedge between Llantwit Major and Llanmaes

Please find enclosed, on behalf of and under instruction from our client, 'Representative Body of the Church in Wales (RBCW)'; 'Ms Rhian Reid' and 'Mr Anthony John Cowling', representations for consideration as part of Vale of Glamorgan's RLDP Deposit Plan.

Context to these Representations

This submission comments on the Deposit Plan, specifically the proposed designation of a Green Wedge between Llantwit Major and Llanmaes, this designation includes our client's site 'Glebelands at Llanmaes', which for clarity extends to the following:

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The site is divided into three parcel's, each under separate client ownership. For context, the site ownership plan is provided below.

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Parcel 1 Representative Body of the Church in Wales (RBCW)
Parcel 2 Ms Rhian Reid
Parcel 3 Mr Anthony John Cowling

The Green Wedge

As part of the Deposit Plan, updated Proposals and Constraints Maps have been published by the Council. The Deposit Plan Proposals Map sets out the Vale of Glamorgan's green wedge designations. For context, a number of Green Wedge designations (7 in total) are made by the existing adopted LDP (the Development Plan). The Deposit Plan Proposals Map sets out that the Vale of Glamorgan Council proposes a designated Green Wedge between Llantwit Major and Llanmaes, accordingly, one of 2 new / additional green wedges (responding to submissions made through the RLDP Candidate Site Process). For ease of reference, an extract of the relevant Proposals Map is provided overleaf:

Deposit Plan Proposals Map

Alongside the Proposals Map, the Deposit Plan RLDP Written Statement sets out and includes Policy DNP2 (Green Wedges) which states the following:

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The subtext to the policy also sets out the following:

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These Representations (Objections)

We appreciate the intention of the Llanmaes and Llantwit Major green wedge is to "prevent the coalescence of settlements and to retain the openness of land" – in this case and instance Llantwit Major and Llanmaes.

Whilst we do not raise objection to the designation of a Green Wedge per se (i.e. an outright objection to the principle and / or extent of some of the designation proposed) we do object to the particular extent of, and precise definition of, its extent. Accordingly, our clients' representations seek to omit their land 'Glebelands at Llanmaes' from the proposed Green Wedge, for the reasons set out below, and evidenced as follows.

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Step 18 of the Green Wedge Assessment seeks to 'Determine whether outer boundary should be adjusted in order to use clear boundary features, or to simplify its form'. Paragraph 3.5. of the Green Wedges Background Paper (BP27) reiterates the PPW guidance for defining green wedges "boundaries should be chosen carefully using physical features and boundaries to include only that land which it is necessary to keep open in the longer term". In respect to the Llantwit Major and Llanmaes green wedge, the assessment itself acknowledges that the designation should "Use Llanmaes Brook which forms the southern edge of the existing Conservation Area boundary as the northern boundary of most of the green wedge to the southeast".

Given this, it is questioned as to why the designation extends northwards beyond the Llanmaes Brook. There are already clear, distinguishable physical features – including the B4265 and the Llanmaes Brook (illustrated on the image below). These physical features are adequate and sufficient barriers to development north of the by-pass – which is designated as 'countryside' and does not adjoin a/the settlement boundary (to either Llantwit Major and / or Llanmaes) and is significantly protected in policy terms as a result.

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Summary and Conclusion of these Deposit Representations / Objections

In summary, these representations to the Deposit Plan object to the green wedge designation between Llantwit Major and Llanmaes, specifically the inclusion of the 'Glebelands at Llanmaes' site.

It is considered the assessment for this green wedge is not soundly based. As set out above, the decision to include the Glebelands site is not justified given that the intentions of the green wedge can be maintained with the omission of our

clients site. A more appropriate, evidence-led boundary is therefore put forward, following clear defensible physical features by adjusting the northern edge of the Green Wedge to correspond with Llanmaes Brook.

Given the detailed nature of this representation our clients would be happy to discuss any aspect of this letter when your Authority comes to evaluate the content.

We look forward to hearing from you in due course. In the meantime, however, we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is required or considered beneficial.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3zy
Email representation redacted - https://valeofglamorgan.oc2.uk/a/3qc

4725 Object

Document Element: DNP3 – GLAMORGAN HERITAGE COAST

Respondent: Mr James Osgood [1383]

Summary:

In its current form, I object to the Deposit RLDP insofar as it does not provide sufficient policy protection for the setting of the Glamorgan Heritage Coast, nor does it adequately address cumulative impacts and infrastructure fairness for villages such as Gileston and St Athan.

Full text:

Respondent: Resident of Gileston
Area of Interest: Gileston, St Athan and the Glamorgan Heritage Coast

1. Introduction and Context

I am a resident of Gileston and a regular user of the Glamorgan Heritage Coast, surrounding public rights of way, and the local road network between Gileston and St Athan. My comments relate to the implications of the Deposit Replacement Local Development Plan (RLDP) for the setting of the Glamorgan Heritage Coast, the villages of Gileston and St Athan, and the cumulative impacts of strategic development in this part of the Vale.

I recognise the need for the RLDP to support decarbonisation, renewable energy, and employment growth. However, the Plan must do so in a way that protects nationally important landscapes, avoids inappropriate development in sensitive locations, and ensures that communities hosting strategic development receive tangible infrastructure benefits.

2. Protection of the Glamorgan Heritage Coast and Its Setting

The Glamorgan Heritage Coast is one of the Vale's most valuable environmental and recreational assets and is fundamental to the character, identity and wellbeing of nearby communities, including Gileston. While the Deposit Plan recognises the importance of the Heritage Coast itself, there is insufficient clarity and strength in policy terms regarding the protection of its wider setting, particularly from large-scale or industrial forms of development on adjacent greenfield land.

The RLDP should be strengthened to ensure that development proposals within the setting of the Heritage Coast are subject to a robust presumption against development where landscape character, visual amenity, tranquillity, or public enjoyment would be harmed. Without this clarity, there is a real risk of incremental erosion of the coastal landscape through development that may be justified as "strategic" but is poorly located.

3. Gileston and St Athan – Cumulative and Place-Based Impacts

Gileston is a small rural village with limited services and infrastructure, located adjacent to open countryside and the coast. St Athan, while larger and more developed, already experiences pressure from major employment and infrastructure uses, including the former MOD site and proposed strategic employment and energy uses in the wider area.

The RLDP should do more to assess and respond to the cumulative impacts of development affecting this corridor of the Vale, rather than considering sites in isolation. This includes impacts on landscape, traffic, tranquillity, and the everyday experience of residents and visitors.

4. Strategic Energy Development and Site Selection

I support renewable and low-carbon energy development in principle. However, the RLDP should make clear that such development must be directed to appropriate locations, with a strong preference for previously developed or industrial land. In this part of the Vale, the former Aberthaw Power Station site represents a logical location for energy-related uses, given its industrial character and existing infrastructure.

The Plan should avoid creating policy ambiguity that could be interpreted as support for large-scale energy infrastructure on greenfield land in sensitive coastal or rural locations, particularly within the setting of the Heritage Coast.

5. Infrastructure and Fairness to Host Communities

A key concern for residents of Gileston and St Athan is that strategic development brings limited direct benefit to local communities while generating long-term impacts. The RLDP places significant emphasis on growth and strategic infrastructure, but there is insufficient certainty that villages hosting or neighbouring such development will see meaningful improvements in connectivity or services.

In particular, the Plan should take a more proactive approach to safeguarding and planning for enhanced public transport connectivity in the Barry–Rhoose–Llantwit Major corridor. While the delivery of a new rail station serving St Athan and potentially Gileston would be a long-term and multi-agency undertaking, the RLDP could play a critical role by

safeguarding land, identifying the corridor as a priority for future rail or rapid transit enhancement, and linking strategic development to long-term transport planning objectives.

Without such forward-looking infrastructure commitments, communities risk bearing the impacts of development without corresponding benefits.

6. Conclusion and Requested Changes

In its current form, I object to the Deposit RLDP insofar as it does not provide sufficient policy protection for the setting of the Glamorgan Heritage Coast, nor does it adequately address cumulative impacts and infrastructure fairness for villages such as Gileston and St Athan.

I would urge the Council to strengthen the Plan by:

Explicitly protecting the setting of the Glamorgan Heritage Coast from inappropriate development

Directing strategic and energy-related development to brownfield and industrial sites wherever possible

Embedding a clearer, place-based approach to cumulative impacts

Committing to long-term transport and infrastructure planning, including safeguarding opportunities for improved rail or high-quality public transport serving St Athan and surrounding communities

Subject to these changes, the RLDP would provide a more balanced and sustainable framework that supports growth while respecting the unique environmental and community assets of this part of the Vale.

Change suggested by respondent:

I would urge the Council to strengthen the Plan by:

Explicitly protecting the setting of the Glamorgan Heritage Coast from inappropriate development

Sound: Not specified

Attachments: None

6749 Object

Document Element: DNP3 – GLAMORGAN HERITAGE COAST

Respondent: Hallam Land Management [854]

Agent: Savills

Summary:

Hallam suggest that the preparation of the RLDP provides the opportunity to define the extent of the Glamorgan Heritage Coast to respond to both the landscape value of certain sites but also the wider aspirations of the RLDP. If it is not within the gift of VoG to redefine the boundaries of the Glamorgan Heritage Coast through the RLDP then Hallam suggest that an additional element could be added to this policy to confirm that it does not apply to land which is allocated for development.

Full text:

1.1. Savills is instructed by Hallam Land ('Hallam') to respond to the consultation on the Deposit version of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').
1.2. Hallam is the strategic land arm of Henry Boot PLC and is one of the UK's most well established and successful land promoters. Hallam operates throughout England, Scotland and Wales from 7 regional offices working with landowners, developers, local authorities, communities and other parties to bring forward development opportunities. Hallam has been in operation since 1990, specialising in obtaining planning permission and delivering development larger schemes including new communities and urban extensions.
Background to Representations
1.3. The Preferred Strategy was published in November 2023. The Preferred Strategy identified "Land West of St Athan" and "Land South of the B4265, St Athan" (Site IDs 456 and 457) as one of five Key Sites in the Preferred Strategy. Both of these sites are under the control of Hallam and were submitted as part of the Call for Sites. A site-specific illustrative masterplan and policy wording were provided under Policy SP4 KS5 (Land to the West of St Athan).
1.4. Hallam submitted representations on the consultation on the Preferred Strategy. These representations were very much supportive of the identification of "Land to the West of St Athan" as a Key Site and the approach that was taken more generally taken in the Preferred Strategy.
Approach to Responding to Consultation
1.5. The VoG has published the Deposit version of the RLDP. The Deposit is the first version of the RLDP to include emerging allocations, and detailed development management policies, as well as a Proposals Map. It is accompanied by a substantial evidence base which includes various supporting technical documentation submitted as part of the promotion of the allocated sites.
1.6. Building upon the Preferred Strategy, the Deposit RLDP proposes to allocate Land to the West of St Athan as a Key

Site. The site is identified under Policy HG1 KS5 (Land to the West of St Athan) as key mixed-use site with capacity for 600 new homes alongside new community and commercial facilities.
1.7. Hallam's representation to this consultation broadly splits into three separate sections:
• It offers general support for the housing requirement, growth strategy and settlement hierarchy. This is covered in Chapter 2 of this Statement;
• It wholly supports the approach of allocating Land to the West of St Athan as part of the Deposit RLDP whilst also providing detailed commentary on the specific wording of Policy HG1 KS5 (Land to the West of St Athan). This is covered in Chapter 3 of this Statement; and
• It provides commentary on a range of development management policies. This is covered in Chapters 4, 5, 6, and 7 of this Statement.
1.8. As well as this Statement, Savills has provided commentary on these specific policies under the VoG's consultation website.

Policy SP1 (Sustainable Growth Strategy), Policy SP2 (Settlement Hierarchy), and Policy SP6 (Housing Requirement)
2.1. Together, these policies have the effect of:
• Setting the housing requirement to be delivered over the RLDP plan period of 7,890 homes with a flexibility allowance applied on top so that provision is made for a total of 8,660 homes. This is the same housing requirement to that included in the Preferred Strategy which was found by Welsh Government to be in conformity with Future Wales (Policies SP1 and SP6);
• Identifying the extent of the Strategic Growth Area as the primary focus of new housing growth. Concentrations of new housing are focussed in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity. St Athan is a specifically named settlement within the Strategic Growth Area (Policy SP1); and
• Identifying St Athan as a Primary Settlement in the third tier of the settlement hierarchy. This is the same tier of the settlement hierarchy as St Athan is in the adopted LDP (Policy SP2).
2.2. Hallam are generally supportive of the aims of these three policies.
2.3. They recognise that the housing requirement has been subject to extensive scrutiny and been found to be appropriate by Welsh Government in response to the Preferred Strategy. In that sense, there is nothing further for Hallam Land to comment upon here other than to note that it should reasonably be seen as the minimum number of homes that the RLDP should be aiming to deliver, particularly following the publication of the 2022-based household projections between Welsh Government's comments on the Preferred strategy and the publication of the Preferred Strategy.
2.4. The strategy – of focussing new housing in those locations served by existing transport routes and where there are opportunities to enhance sustainable transport connectivity – is wholly supported. St Athan is clearly already a sustainable location for growth and its sustainability and connectivity have clear potential to enhance alongside further development. The delivery of growth in St Athan is therefore considered to firmly align with the RLDP's strategy.
2.5. The continued positioning of St Athan as a Primary Settlement in the third tier of the settlement hierarchy is considered appropriate though clearly the delivery of two Key Sites within St Athan as part of the RLDP has the potential to further elevate its position in the future. This is reflected in Table 10 of Background Paper 5 Settlement Appraisal Review where St Athan is given one of the higher scores of the Primary settlements.

Policy HG1 KS5 (Land to the West of St Athan)
3.1. Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.
3.2. There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.
3.3. The relevant policy for Land to the West of St Athan is Policy HG1 KS5.
3.4. As a starting point, Hallam wholeheartedly support the allocation of Land to the West of St Athan as a Key Site within the RLDP. Hallam made a comprehensive submission as part of the Call for Sites stage and since then have worked proactively with the VoG and other stakeholders to demonstrate that the site is suitable, deliverable, and viable. It's identification as a Key Site in the Deposit RLDP represents extensive and thorough assessment – its proposed allocated is therefore considered to be sound and firmly evidence based.
3.5. So that the policy functions as effectively as possible, Hallam has a small number of comments and included at Appendix A is a re-worded version of Policy HG1 KS5 which incorporates those changes with text suggested to be removed crossed through and text to be added shown underlined.
3.6. These proposed adjustments are considered in turn below and are structured around the sub-headings that are contained within the policy wording itself.
Site Capacity and Housing Trajectory
3.7. Extensive environmental and technical work has been undertaken by Hallam to support the promotion of the site and the development of a masterplan (and site capacity) that responds to the site's constraints and opportunities.
3.8. That said, Hallam is not a housebuilder and once an outline planning application has progressed, Hallam will identify a development partner (which could be a single or multiple housebuilders / housing associations). Clearly different

housebuilders have different house types and differing approaches to density.
3.9. In addition, whilst a lot of technical and environmental work has been undertaken to date, clearly further technical work would be submitted at planning application stage which would further validate the site's capacity.
3.10. Legislative and guidance changes also have the potential to impact a site capacity. Whilst the masterplanning process has been prepared to be SAB compliant, the impact of the introduction of the requirement to secure SAB approval has had an impact on site capacity and it follows that a further, and as yet unknown, legislative or guidance change could have a similar impact.
3.11. This is not to suggest that there isn't a high degree of confidence that the site can deliver roughly 600 homes, rather that Hallam suggest that the word 'approximately' is added to the policy wording to reflect the potential for a degree of deviation (which could be upwards or downwards).
3.12. Background Paper 9A Housing Land Supply and Housing Trajectory sets out the anticipated annual delivery rates for housing over the RLDP. With regards to the ability of the site to deliver the number of homes it is allocated for in the RLDP plan period, the housing trajectory for the site reflects that the first completion date was pushed back from 2027/2028 to 2028/2029 since the consultation on the Preferred Strategy. This means that the whole site continues to be shown as being delivered within the RLDP plan period.
3.13. Hallam support and agree with the approach set out in the Draft Housing Trajectory and see it to be realistic and achievable based on their experience and subject to usual caveats around the condition of the market, RLDP progression, and swift determination of a planning application.
Affordable Housing
3.14. At present, Policy HG1 KS5 (like all of the standalone policies for the other four Key Sites), states that the site should provide a minimum of 210 affordable housing units. This figure is derived from 35% of the number of homes that the site is allocated for (600 homes).
3.15. Worded at present, a strict interpretation of this policy could be that 210 affordable units must be provided onsite regardless of the total number of homes that are proposed. For example, it could be interpreted as requiring a fixed number of affordable homes of 210 homes, even if the total number of homes that are proposed on the site is fewer than the 600 homes that the site is allocated for or, conversely, that only 210 homes should be delivered as affordable if more than 600 homes were to be delivered and the RLDP allocation exceeded.
3.16. Hallam recognise that this is not what the policy wording is seeking to achieve (and their viability work for the site is based on the site delivering 600 homes of which 35% are affordable) but suggest that its wording could be clarified by removing reference to a specific number of affordable homes for the site to deliver in favour of just the affordable housing percentage being noted in the policy.
3.17. Hallam also suggest that the requirement for affordable housing units to not be in clusters of more than 10 homes is removed and that the approach is for this to be considered on a site by site and case by case basis and with recognition that Policy HG5 (Affordable Housing Exception Sites) which can provide a framework for 100% affordable sites of more than 10 homes to be delivered. As an example, and in the case of Land to the West of St Athan, the "Land South of the B4265, St Athan" (Site ID 457) portion of the site is likely better suited to a mixed-use development alongside the future St Athan Railway Sation. This portion of the site is probably better suited to a flatted form of development (either above non-residential uses or as a block) which tend to be delivered as 100% affordable housing developments rather than comprising a mix of private and affordable housing.
Sustainable Transport and Highways
3.18. This part of the policy sets out expectations relating to sustainable transport and highways and there are a number of matters which Hallam wish to comment on.
3.19. As a starting point, Hallam support the delivery of St Athan Railway Station and therefore commits to its safeguarding. Likewise, Hallam recognise the potential suitability for the "Land Between the Railway Line and B4265, St Athan" (Site ID 458) site to accommodate a Welsh-Medium Secondary School and can also therefore commit to safeguarding land for the delivery of a pedestrian and cycle bridge over the railway line. Specific comments on Policy TR1 (Transport Proposals) and Policy CI3 (New Community Facilities) are made elsewhere in this Statement.
3.20. With regards to the Sustainable Transport and Highways section of Policy HG1 KS5, Hallam's overall position is that a careful balance needs to be reached between the policy wording being explicit as to what highway works must be delivered and reserving consideration of this until planning application stage where the exact site capacity is better understood and a full Transport Assessment submitted.
3.21. At present, Hallam's view is that the policy wording is overly explicit and suggest that it could be qualified through the addition of the following text before listing the offsite highways improvements:
'Subject to the Strategic Transport Assessment and site-specific Transport Assessment submitted at planning application stage'.
3.22. Turning to the specific offsite highways measures that are listed within the policy wording, Hallam have four comments.
3.23. Firstly, it is suggested that the delivery of an active travel link along the B4265 between the site entrance and the Gileston Road junction should be secured via a financial contribution that is pooled with KS4 Church Farm. This reflects that the delivery of this link not only links Hallam's site to other services in St Athan but also linking KS4 Church Farm to the services that are proposed and uses for which land is safeguarded within Hallam's site. Clearly this is also to the benefit of existing residents of St Athan. This would reflect the approach that is proposed to be taking for the pooling of Section 106 monies for the delivery of an active travel route between St Athan and Llantwit Major.
3.24. Secondly, Hallam flag the need for the RLDP to be sufficiently flexible with regards to the delivery of an active travel link between St Athan and Llantwit Major. Ultimately, the purpose of delivering this active travel route would be to provide a connection from St Athan to Llantwit Major Railway Station and the delivery of a Railway Station in St Athan would remove the necessity of delivering this active travel connection. Hallam's suggested amendments to the policy wording seeks to reflect this.

3.25. Thirdly, Hallam have been consistent in highlighting that, whilst there is an aspiration to deliver an improved pedestrian link along Llantwit Road, a combination of the road width and the extent of third party ownerships make delivering a continuous link very challenging with a pragmatic approach instead needing to take place that recognises the ability to deliver betterments but acknowledges that delivering a continuous link is unlikely to be possible. Hallam has suggested additional wording to clarify this.
3.26. Fourthly, Hallam highlight that the designing of a loop road within the site to facilitate access by a bus may be superfluous and represent an over-engineered solution given the potential for the St Athan Transport Interchange that land is safeguarded for under Policy TR1 (Transport Proposals) is envisaged to accommodate infrastructure to accommodate a bus connection. On that basis, it is suggested that the following clause is added to the policy wording to reflect that bus connectivity to the site may be delivered not via an internal bus loop:
'Subject to progress on the St Athan Transport Interchange as land is safeguarded for under Policy TR1 (Transport Proposals)'
Community Infrastructure
3.27. There are three points which Hallam wish to make in connection to this element of Policy HG1 KS5.
3.28. Firstly, Hallam suggest that the wording of the part of the policy relating to financial contributions to fund the delivery of additional school places needs to be adjusted. At present this part of the policy is worded as if there is an automatic requirement to provide Section 106 monies for school places where Circular 13/97 is clear that a contribution should only be sought where the schools do not have current projected capacity to accommodate the new children from the development. Hallam's proposed adjustments seek to ensure that this part of the policy reflects this though note that Background Paper 43 Education forecasts a need for a financial contribution to be made for additional school places at all English and Welsh primary and secondary schools that the site is within the catchment of.
3.29. Secondly, Hallam note that Table 10 of Background Paper 34 Community Facilities identifies an existing over-provision of community space within the St Athan Ward of 778sqm and a surplus of 531sqm of community floorspace at 2036 when the level of housing to be allocated in the Deposit RLDP is delivered. It is understood that this is on the basis of no community floorspace being delivered as part of Hallam's proposals or as part of the KS4 Church Farm site. Hallam suggest that the wording of this element of the policy needs to reflect that community floorspace should only be required to be provided in the case of a local shortage in provision. Aligned to this, Hallam also suggest that the reference to specifically providing a 'community building' is adjusted to instead make reference to 'community space'. This reflects that the community space element of scheme, if indeed it is actually required, could be a part of a larger mixed-use building (probably in the Mixed-Use / Community area) rather than as a standalone building.
3.30. Thirdly, Hallam note the error in the wording of the sixth bullet point under the 'Sustainable Transport and Highways' heading where reference is made to the safeguarding of land on the southern side of the railway line as being identified in Policy CI3(2) where-as it should be Policy CI3(6). This is a minor amendment that should be made to ensure consistency.
Green Infrastructure, Recreation Spaces, and Biodiversity
3.31. The masterplan prepared by PAD Design and submitted by Hallam shows the site delivering a mix of public open space and green infrastructure including the provision of allotments, a Neighbourhood Equipped Area of Play, a Local Equipped Area of Play, and a sports pitch. This is welcomed in Background Paper 32A Green Infrastructure Assessment of Key Sites which, at Paragraph 5.55 recognises that a 'ground up' approach has been taken in the masterplanning approach.
3.32. This is shown indicatively to illustrate the composition of public open space and green infrastructure that the site could provide alongside the other elements of built development that the site is allocated and the masterplan makes provision for.
3.33. Whilst, Hallam recognise the need to provide public open space, the starting point for this should be the Fields In Trust Standards and Hallam therefore suggest an approach where the policy wording is not specific about what forms this should take.

Policy TR1 (Transport Proposals)
4.1. This policy identifies three active travel routes and two public transport schemes that the Deposit RLDP safeguards land for, as well as three highway improvement schemes that are identified as being required to mitigate the impact of development. Two of these are in St Athan – one being the St Athan Transport Interchange for which land is safeguarded for and the second being the Gileston Road Junction which is identified as a required highway improvement. Both are considered in turn below.
St Athan Transport Interchange
4.2. Hallam support the safeguarding of land for the St Athan Transport Interchange and see that its delivery would be to the benefit of the Key Site itself but also more broadly to St Athan and western parts of the VoG.
4.3. It is clear from discussions with Transport for Wales that there is a strong business case for the delivery of a railway station and that the creation of "critical mass" through residential development around it has a key role in driving its delivery, as does the nationally significant economic role that the Bro Tathan Enterprise Zone has and the Aberthaw Green Energy Park will have. The proximity of St Athan to both of these hubs clearly contributes to its fundamental sustainability and suitability for growth whilst the further development of a critical mass of housing and employment generating uses will further support linkages between them and strengthen the business case for a new railway station at St Athan. This is reflected in TFW's 'Today, Tomorrow, Together: A Vision for Rail Across Wales and the Borders' which confirms that the delivery of St Athan Railway Station remains in TFW's pipeline which has been endorsed by the Westminster Government.
4.4. The location that is identified on the Proposals Map is Transport for Wales' preferred location within the site and has been incorporated into the masterplanning approach which seeks to create a node around it by incorporating a bus interchange and a mix of uses.

4.5. At present, the Proposals Map identifies the location of the Railway Station using a red star which is positioned on the railway line itself but without the required land take not spatially being defined.
4.6. Whilst Hallam recognise that the exact land take required will need to be refined further through discussion with TFW, it may be the case that the mixed-use element on this portion of the site comes forward before the Railway Station.
4.7. The early delivery of these elements should be welcomed as clearly the mixed-use element both enhances the range of services and facilities in St Athan but also would mean that the Railway Station is integrated upon delivery.
4.8. On that basis, it is imperative that the safeguarding of land for the Transport Interchange is limited only to that land required to deliver the Transport Interchange and is done in such a way such the safeguarding does not sterilise non-transport related development from this portion of the site until the Railway Station has been delivered.
Gileston Road Junction, St Athan
4.9. Paragraphs 6.199 and 6.200 relate to the expectation that vehicle trips as a result of RLDP allocations in St Athan are anticipated to trigger the need to upgrade the Gileston Road Junction to a signal-controlled arrangement. This is informed by the conclusions of Table 3 of the Strategic Transport Assessment which forecasts that the junction will be operating above capacity during both the weekday AM and PM peak by the RLDP's end point.
4.10. Hallam note that Technical Note 08 of the Strategic Transport Assessment identifies that the improvements to the Gileston Road Junction are to be delivered by VoG and funded through financial contributions from seven sites that the RLDP proposes to allocate.
4.11. Improvements to this junction are to be funded by a number of sites; however it is unclear whether (and if so, when) forward funding will be secured by the Council and clearly there cannot be a situation where none of the sites can deliver homes until strategic highways works are funded / completed. We therefore seek further clarification over the phasing of these works and note that early delivery of homes ahead of strategic highway improvements is likely to be important for deliverability of each strategic site.
4.12. To respond to Hallam's above comments, one approach could be for references to highway improvement works to be entirely removed from this policy or, if they are to remain, that qualifying text is added to note that the need for and format of any improvements will be subject to detailed consideration at planning application stage and that such contributions must be justified in planning terms, particularly where (in the case of Pen Y Turnpike Road and Waycock Cross for Land to the West of St Athan), the distance from a site and the junction to be improved is significant and therefore thee number of vehicle trips that would be generated modest.
4.13. This aligns with Hallam's suggested approach to the specific wording of Policy HG1 KS5.

Policy CI1 (Open Space Provision)
5.1. This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.
5.2. Hallam note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.
5.3. Hallam is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter.

Policy CI3 (New Community Facilities)
6.1. As well as allocating land for five new or improved education developments, this policy safeguards 'Land South of the Railway Line, St Athan' for the delivery of a Welsh-medium secondary school.
6.2. This policy is clearly of interest to Hallam because Paragraph 6.250 places a requirement for the safeguarding of land on the northern side of the railway line on their Land to the West of St Athan Key Site for a footbridge to land on.
6.3. With the policy wording being intentionally light-touch, Paragraph 6.250 of the Deposit RLDP provides greater detail about the safeguarding of this land (and other paragraphs in the Deposit RLDP relate to other community facilities that Policy CI3 covers). It effectively does two things.
6.4. Firstly, it notes that the delivery of this school will require active travel improvements including the safeguarding of land for a pedestrian and cyclist footbridge over the railway line.
6.5. Secondly, it is clear that the safeguarding of this land is in response to a forecast increase in demand for Welsh-medium secondary school places across the whole of the VoG as a result of expanded capacity at Welsh-medium primary schools across the VoG. On this basis, it follows that this location has been selected as a preferred location because of its ability to serve the wider sub-region.
6.6. Hallam recognise that this site could be a suitable location for a Welsh Medium Secondary School and, as a principle, is agreeable to the safeguarding of land for the footbridge landing on the northern side of the railway line.
6.7. Paragraph 6.250 of the Deposit RLDP is clear that the delivery of a Welsh-Medium secondary school is in response to a regional / sub-regional demand rather than a local need as a result generated either by the development of Land West of St Athan or other emerging allocations within St Athan and it cannot be the case that Hallam are expected to make disproportionate contributions to either the delivery of the school or required active travel improvements just because they have control of the site or that it is next to the Key Site.

Policy CC1 (Residential Operational Net Zero Carbon Development)
7.1. The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) before the policy wording sets out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable

electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.
7.2. As a starting point, Hallam share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) can present challenges. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this will result in an uneven framework for housebuilders, significantly adding cost and reducing certainty.
7.3. The justification for using planning policy to set requirements exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.
7.4. There are two points to be made by Hallam here:
7.5. Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage that such an approach would not be sound. This Written Ministerial Statement was subject to an unsuccessful judicial review.
7.6. Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations. Where there are existing Local Plans in England that take this approach, they do not align with the Westminster Government's position and there will be no Local Plans emerging including such policies.
7.7. Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs (Bridgend and Merthyr Tydfil) do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound at Examination stage.
7.8. Secondly, Hallam have concerns with the approach that has been taken with regards to viability.
7.9. From Hallam's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.
7.10. As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated. This is important as it demonstrates that, whilst Hallam do not believe such a policy approach should be taken, the development of the site at the time of the completion of the Development Viability Model for the site is viable whilst meeting the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development).
7.11. Hallam's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. This concern is particularly exacerbated by the fact that, as recognised at Paragraph 6.47 of Background Paper 42 Viability Assessment, takes the lowest estimate for the works required to achieve these policy expectations, Savills' experience – both that of their development land team based in Wales and their environmental sustainability team based across England - is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.
7.12. Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy DNP3 (Glamorgan Heritage Coast)
8.1. This policy relates to the Glamorgan Heritage Coast, identifying a series of land uses that are permissible within the policy area before setting three tests that must be satisfied for development within the Glamorgan Heritage Coast to be permissible where there is an adverse environmental impact.
8.2. Hallam note that the 'Land South of the B4265, St Athan' portion of the land that they control is both proposed to be retained as part of the Glamorgan Heritage Coast (a continuation of the position taken in the adopted LDP) whilst also forming part of the Land to the West of St Athan Key Site where the masterplan at Figure 17 shows it as accommodating the potential new railway station and a mixed-use area (including car parking).
8.3. The relevant extract of the Proposals Map is replicated below:
8.4. The exact composition of the buildings proposed on this portion will require further refinement and will need to be driven by occupier requirements, but the masterplanning work undertaken by pad Design envisages that they could provide a mix of retail and food and drink uses most likely across some or all of the ground floor, alongside workshop, co-working or office incubator space at upper floor levels and perhaps at ground floor level. There could also be the potential for additional homes, likely in the form of apartments at upper floors, as part of a mix of uses. It is realistic therefore to anticipate that this portion of the site will accommodate buildings of up to three or four storeys with a high plot ratio to reflect the uses and supporting infrastructure that it is to accommodate.
8.5. Hallam's position is that the continued inclusion of this parcel of land as part of the wider Glamorgan Heritage Coast is inappropriate for two reasons.
8.6. Firstly, and its most basic level, the approach of allocating the site for development whilst retaining a designation that inherently seeks to restrict the type, form, and quantum of development, is wholly contradictory.

8.7. Designation of this portion of the site as part of the Glamorgan Heritage Coast will mean, given that the uses that Figure 17 envisages as being delivered on the site are not those that the first part of Policy DNP3 (Glamorgan Heritage Coast) allows for, any application for development will need to demonstrate that there is a compelling need for the development, that the benefits outweigh the harm, and that appropriate mitigation measures are in place. This the potential to prejudice its development or, at very least, greatly impact how it is developed whilst requiring.
8.8. Secondly, it is difficult to see how this land warrants ongoing inclusion within the designated Glamorgan Heritage Coast. This is something that is considered in more detail in the Review of Landscape Character and Visual Amenity (December 2022) prepared by FPCR and submitted as part of the Call for Sites (and also available as part of the consultation on the Deposit RLDP as a piece of Key Site Supporting Information). Paragraph 5.13 of the FPCR document concludes on this piece of land that:
'Through the fieldwork it is considered that the Site does not display any "special environmental qualities" identified by the Policy and plays no intrinsic role in the Policy designation, as it is effectively forms a rather ordinary grazing field. It is influenced by the urbanising elements of the adjacent B4265, the Railway Line, the Tarmac Cement works, and to some degree the built edge of St Athan. Furthermore, it is bound and contained by trees and woodland beside the railway line, which prevents wider intervisibility with the coastline.'
8.9. Taking the above together, Hallam suggest that the preparation of the RLDP provides the opportunity to define the extent of the Glamorgan Heritage Coast to respond to both the landscape value of certain sites but also the wider aspirations of the RLDP. If it is not within the gift of VoG to redefine the boundaries of the Glamorgan Heritage Coast through the RLDP then Hallam suggest that an additional element could be added to this policy to confirm that it does not apply to land which is allocated for development.

Appendix A - rewording of Policy HG1 KS5

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3y3

7172 Support

Document Element: DNP3 – GLAMORGAN HERITAGE COAST
Respondent: Wig Fach Property Company Ltd [2373]
Agent: Geraint John Planning Ltd

Summary:

We would offer general support for this policy and consider this to provide flexibility which allows for certain forms of development.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ogmore By Sea area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will

continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either Key Settlement, Service Centre settlement or Primary Settlements, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Ogmore By Sea. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The

greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process

(which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of

housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that the should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 124 affordable homes in the St Brides Major local housing market area (which Ogmore is located within). As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

It is questionable whether Wick has the capacity to accommodate 50 new dwellings, given the sustainability and rural nature of the area. As a result, it is suggested that the number of homes allocated in Wick is reduced and that a further allocation in St Brides Major is secured, in order to facilitate supporting the delivery of affordable housing through the housing market area, rather than in one minor rural settlement. The sustainability of Ogmore has been assessed, both by the Council through the Sustainability Appraisal and again, through our assessment of the site.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a

target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4 % of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.

Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ogmore and the proposed site. As outlined within these representations, it is considered that the site (ID xxx) represents a sustainable, deliverable and acceptable site. The site is within a maximum of a 22- minute bus journey to a every key service listed, due to the proximity of the site to settlements such as Bridgend. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Ogmore By Sea without the need to travel by car. The site is located within 5 miles of Bridgend, and within a maximum 22-minute bus journey of the following services:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre for various Retail Services

Moreover, Ogmore has benefitted from the recent development of the Ogmore By Sea Village Hall, which provides space for community activities and events to take place. The hall also includes a coffee shop (Welsh Coffee Company), which only adds further to the daily services provision available within the settlement. Access to the hall and coffee shop is directly provided for pedestrians from the Main Road, which allows for direct access from the site.

Accordingly, the settlement of Ogmore represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

It is acknowledged that the site also lies within the Glamorgan Heritage Coast and this point is addressed further below.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ogmore By Sea, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a ‘cap’ of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a ‘cap’ limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 “For the purposes of this policy, ‘small-scale’ will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area.”

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

Policy DNP3 – Glamorgan Heritage Coast

Given that the site is located in the Glamorgan Heritage Coast, it is noted that the following policy is of relevance to any future development on the site. Criteria 4 of Policy DNP3 states:

“The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:

4. Other appropriate and sustainable development that accords with National Policy."
It is also noted that supporting Para 6.422 "In seeking to protect the Glamorgan Heritage Coast, the Council acknowledges that there are some built up areas within the boundary, including the Minor Rural Settlement of Ogmore. In addition, the Vale of Glamorgan rail line crosses part of the Heritage Coast designation in the location where a new station at St Athan is proposed. Whilst being mindful of the need to protect the special qualities of the Glamorgan Heritage Coast, the Council accepts that development within these areas is appropriate, subject to relevant policies of the Plan"(GJP emphasis).

We would offer general support for this policy, and consider this to provide flexibility which allows for certain forms of development. However, we would suggest that the policy wording should be amended to reflect that 'housing' should be supported in the Glamorgan Heritage Coast, providing that the policy exceptions are met. Therefore, the following amendment is proposed as part of the policy should be changed to include "small scale housing" or something similar. The proposed amendments to Policy DNP3 are outlined below in red:

"The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development, including small-scale housing proposals that accords with National Policy."

Again, this would ensure that suitable housing developments can be delivered in the Plan period, to meet the housing needs of the Vale of Glamorgan – particularly in respect of affordable housing.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to Policy DNP3 – Glamorgan Heritage Coast, given the lack of recognition for the potential for small-scale housing proposals;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land at Hazelwood, Ogmore By Sea (Site ID: 3855) sets out that the position of the site at the Deposit Stage is as follows:

"The original site as ruled out as the development would represent unacceptable intrusion in to the open countryside. Whilst the site has now been identified for an affordable housing led development, the original reason for ruling it out still remains."
In terms of the assertion that "the development would represent an unacceptable intrusion into to the open countryside", this is strongly disputed, in that the development of the site would represent a natural rounding off of the existing settlement boundary. An extract of the site relative to the settlement boundary is provided below, which clearly shows that the development of the site would not extend beyond the existing settlement pattern that exists in Ogmore.

Site Outlined in Red and Settlement Shaded in Blue
As clearly demonstrated in the above mapping, the site would extend no further eastwards than the existing housing area to the south of the site. Equally, the site would not be extending any further north than the existing settlement pattern in Ogmore. This position is further supported by the wider aerial view of the site provided overleaf:

Wider Aerial View of Site Outlined in Red and Settlement Shaded in Blue

In summary, it is considered that the proposed allocation of the site represents a logical rounding off of the existing settlement, as depicted in the mapping provided above – where the site follows the existing envelope of the settlement. The site does not extend any further eastwards than the established built form located immediately to the south; indeed, it sits comfortably within the same development line.

As such, it cannot be considered that the site represents an 'intrusion' into the countryside, as the site would be visually and functionally related to the settlement. It therefore follows that the site would be read as part of the settlement, and not the wider rural landscape.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage
As demonstrated above, there are no changes to the scoring attributed to the site. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with this submission (see Appendix A).

Sustainability

Notwithstanding the above, it is considered that the site represents a more sustainable location than what was previously assessed at Preferred Strategy stage, in light of the Ogmore by Sea Hall development. The Hall acts as a community facility, whereby the space is available for hire by local community groups such as birthday parties, weddings, group meetings, and other such similar uses. Moreover, a café (Welsh Coffee Co) is located within the premises which sells both food and drink.

The hall and café are within walking distance to and from the site, where new access facilities have been implemented from Main Road directly to the building, to allow access for pedestrians and cyclists. This is illustrated in the image below:

Walking and Cycling Facilities

The Tusker Rock pub and post office are also located along Main Road, all of which are within walking distance to the site.

Accordingly, the site is well served by new amenities (i.e. community hall) that comprehensively improves the

sustainability of the site / settlement, and in turn, improves the sustainability credentials of the site promotion. It therefore follows that the site represents an acceptable location for residential development, and the site should be looked upon favourably accordingly.

It is also the case, as set out in previous representations, that the site is within a maximum 22-minuted bus journey of the following services and facilities:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre.

As such, key services and facilities can be access by sustainable travel over and above the existing level of provision available in Ogmore By Sea (as discussed above).

Accordingly, the relevant 'red' scorings in the Council's assessment should be updated to reflect the site's suitability and sustainability to accommodate the proposed residential development of the site.

Glamorgan Heritage Coast

Insofar as to the position regarding the site's location within the Glamorgan Heritage Coast, detailed submissions are made not only in the Preferred Strategy representations, but also in Annex 1 of this submission. In short, given the pressing need for such development (particularly affordable housing) to come forward in the Plan period to meet ever-increasing needs, development of this nature should be considered more favourably – not least that, as outlined in this Annex, the site would not extend any further that the existing settlement boundary.

Accordingly, the site would be perceived to form part of the settlement of Ogmore By Sea, and not the wider landscape, and therefore, would not have any detrimental impact on the Heritage Coast in any respect. The scoring should be amended accordingly to reflect this position.

Climate Change

As outlined in previous representations, the development will incorporate climate change measures, such as EV charging points, PV panels, as well as adopting sustainable materials for construction whilst maximising the potential for the dwellings to be energy efficient. Accordingly, the development will be built to high sustainable standards, and therefore, the scoring of the site should be amended as a result.

Summary and Conclusion

It has been evidenced above that there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;

8. Detailed comments in respect to 'new' sites;
9. Conclusions Procedural Consultation Matters
Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:
Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston;

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• "Time period of pre-application discussions/PAC consultation" = 4 months
• "Time between submission of planning application and determination" = 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of "6 months" given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of

the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within "4 months" as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicated in the 'Timing and Phasing of Sites' table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large 'spike' (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales

saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-

apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.

Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound,

given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable

housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and

• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale

affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Hazelwood, Ogmore By Sea, the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below.

With reference to the above:

• In terms of public transport, there are two bus stops located approximately 200m (3-minute walk) from the site ('Ogmore By Sea Post Office'), with the '303' providing services between Llantwit Major and Bridgend.

• The site is located 200m (3-minute walk) from the 'Ogmore By Sea Post Office' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

• The site is also located 50m (1-minute walk) from a children's park.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities. This

Furthermore, the settlement of Ogmore By Sea has been ranked higher than Llangan (which the site 'Land to north and west of Westwinds Business Park' is located within) in the VoG Sustainable Settlements Appraisal, and therefore, is considered to constitute a more sustainable location to accommodate residential growth. Most notably, Ogmore By Sea scores '13' in respect to 'Daily Facilities' whereas Llangan only scores '3', evidencing that residents in Ogmore have much better access to services within the locality as compared to Llangan.

Given the above, 'Land at Hazelwood, Ogmore' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be considered "sound" and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of 'Land to north and west of Westwinds Business Park' – the inclusion of which is "unsound". 'Land at Hazelwood, Ogmore' would therefore ensure that affordable units, where "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help

sustain services and facilities within these rural communities", are provided for. As such the proposed housing trajectory would be maintained.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike 'Land at Heol Fain, Wick' and 'Land to north and west of Westwinds Business Park' it was stated that this site "could not be

considered as a suitable affordable housing led development site". Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is "unsound".

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3zt
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3z4
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z6
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3z8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zv
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zc
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zw

7173 Object

Document Element: DNP3 – GLAMORGAN HERITAGE COAST
Respondent: Wig Fach Property Company Ltd [2373]
Agent: Geraint John Planning Ltd

Summary:

We would suggest that the policy wording should be amended to reflect that 'housing' should be supported in the Glamorgan Heritage Coast, providing that the policy exceptions are met. Amendments are proposed as part of the policy to include "small scale housing" or something similar. This would ensure that suitable housing developments can be delivered in the Plan period, to meet the housing needs of the Vale of Glamorgan – particularly in respect of affordable housing.

Full text:

ANNEX 1
Preface

This Annex sets out the detailed case in support of these representations, and by association the case for allocation of the site.

The representations are structured into the following sections:

1. Response to the Deposit Plan;
2. Comments on specific policies; and
3. A summary of the suitability of the site for development.

SECTION 1. Response to the Deposit Plan

Distribution of Growth

We object to the distribution of growth within the Deposit Plan. Specifically, we object to the strategy that underpins the Deposit Plan, which seeks to introduce the proposed 'Strategic Growth Area' which is expected to contain the majority of housing growth in the Vale over the Plan period, or rather the over-reliance on this defined area, and the associated absence of growth in other parts of the Plan area.

As outlined in our previous representations, the allocation of housing and the location of strategic growth neglects the Rural Vale, and in our view, overprovides in the Strategic Growth Area. For example, with limited housing stock and average house sales at over £500,000 over the last 12 months, there is a clear and established need for new homes in the Ogmore By Sea area, particularly at an affordable level. This is reinforced by the Local Housing Market Assessment that identified a need for over 1,114 new affordable homes per annum over the next five years throughout the county, and 196 units per annum thereafter (average of 502 units per annum over 15 years). Further to this, it is widely known that the rural Vale comprises the majority of the county's ageing population, which, as a demographic, has and will continue to grow rapidly over the Plan period. This is evident in the 'Population Change' chart below – which is taken from the Deposit Plan:

VofG Deposit Plan: Figure 4 Population Change 2011 to 2021

It is clearly the case that younger populations are migrating to other Authorities, where access to housing is typically cheaper and more affordable, whilst more older populations are significantly migrating into the Authority. This trend will result in an extremely unbalanced demographic, given that the working-age population have sought housing elsewhere.

Without a suitable supply of affordable housing delivered over the Plan period, this trend will only worsen. Accordingly, it is not considered that the RLDP takes into account the lack of supply of affordable homes within the rural Vale, as well as increased housing to support the growing ageing population within these areas.

Para 3.19 of the Deposit Plan clearly outlines that affordable housing is required in the short term, in order to meet pressing needs. Specifically, it outlines the following: "There is significant pressure on temporary accommodation in the Vale, for a variety of reasons including increased homelessness presentations… The need for sufficient permanent affordable housing to assist in moving people out of temporary accommodation is critical and the planning system has a vital role in assisting in new affordable housing delivery."
Accordingly, the distribution of growth within the Authority must be proportionate, to ensure that populations / areas are not left behind where they must seek access to housing elsewhere.

The RLDP Sustainable Growth Strategy sets out 6 objectives. Objective 4 states: "Allowing for small scale affordable housing led development in settlements outside the Strategic Growth Area at a scale proportionate to the size of settlement." (Page 66)
Para 5.25 states "Therefore, a key part of the strategy is to allow for affordable housing led developments within sustainable primary and minor rural settlements outside of the Strategic Growth Area, at a scale that is appropriate to the size of the community it is serving. An 'affordable housing led' scheme is one where a minimum of 50% of the dwellings would need to be affordable, although this could increase to a maximum of 100% if the site is brought forward by a social landlord".

In terms of the definition / explanation of what the affordable housing-led development sites are seeking to achieve, paragraph 6.132 of the Deposit Plan outlines the following:

"Accordingly, to ensure that new developments respond to the high demand for smaller properties, as identified in the LHMA, priority will be given to affordable homes that are small to medium-sized, typically comprising one to three bedrooms. Representations received from the local community through the RLDP process also highlighted a desire for new housing developments to offer opportunities for accessing smaller market homes. This is particularly relevant in the rural Vale, where housing choices are more limited. Providing smaller, more affordable market homes may assist first-time buyers and enable older residents to downsize to more manageable properties within their local area. Affordable housing-led sites will therefore need to demonstrate that an appropriate range of both affordable and market dwellings has been provided."

Despite the acknowledgement within this strategic objective, we do not consider that the RLDP goes far enough to meet this objective, nor are its provisions and allocations adequate.

It is considered that this objective is undermined by the allocations set out by the RLDP (not least the absence of allocations in the rural Vale). Notwithstanding the Vision's clear acknowledgement of the benefit of the growth of the rural Vale, these areas have not been supported through the plan due to the lack of growth which has been attributed to these areas in terms of further housing, employment and sustainable transport. All growth options have been selected on the basis of being in either Key Settlement, Service Centre settlement or Primary Settlements, all of which are already sustainable areas served by rail. As a result, it is not clear how this objective can be achieved, without the allocation of further sites within the Minor Rural Settlements, such as Ogmore By Sea. The Vale is characteristically 'rural', and as such, there needs to be a stronger emphasis on supporting and delivering new development in order to bolster the rural

economy. This includes enabling opportunities to provide employment and business premises within / near to rural settlements, as well as focusing housing growth in these areas to reduce travel time, and use of sustainable transport.

It is considered that the current Strategy does not provide adequately for all residents across the Vale, only those within the Strategic Growth Area. The underlying Vision and Objectives set out in the emerging Plan are accordingly wholly un-provided for by the detail of the Plan. This brings into question the "soundness" of the Plan.

The Strategic Growth Area does not take into account the important role and proximity of Bridgend to the West and/or the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north (as defined in the RCTCBC LDP). The Minor Rural Settlements to the west are more likely to be supported by job opportunities and employment in Bridgend than further east in Barry or Cardiff. Similarly, those in the north align with, and function in association with, the Principal Settlement and Strategic Growth Area of Talbot Green / Pontyclun / Llantrisant to the north. These settlements are served by existing bus services that provide sustainable modes of travel to key employment locations in and around Bridgend. This is acknowledged in Paragraph 3.3 of the Strategy which states "The greatest number of residents who travel outside of the Vale for work purposes travel to Cardiff followed by Bridgend and Rhondda Cynon Taf, whilst a smaller proportion commute into the Vale from these neighbouring authorities". The Demographic Evidence (Feb 2023) estimates the Vale as being a net importer of workers from RCT and Caerphilly (Para 3.6) - as shown in Figure 10 in the Preferred Strategy.

The current Strategy does not support any improvement of sustainable travel or further investment in settlements linked more closely to these areas - given that Growth has been apportioned in only the Key Service Centre and Primary Settlements. It is considered that this will fail to support and facilitate the current (and any future) employment coming into the Vale, nor will it support any employment which is located outside of the Vale to the West and North. The Growth Option is too heavily reliant on access to railway stations as the key and sole sustainable transport method, whereas access to bus services should also be appropriately assessed and focused on in terms of promoting sustainable development. It is unreasonable to devise a strategy that hinges on directing growth to areas that are accessible to railway facilities, where it is recognised in the Plan that the Vale is inherently rural. The delivery and soundness of the Plan is therefore questioned and we continue to object to the spatial growth strategy as set out in the Deposit Plan.

Housing Supply

RLDP Allocations - Key Sites

As set out in representations made throughout the Plan preparation process, we consider that the Plan is too reliant on the delivery of 'key sites' to meet the housing need over the Plan period. Specifically, the Plan makes provision for 2,278 units in these Key Sites, which equates to circa 65% of RLDP allocations in the housing supply. The 5 key sites that are allocated in the Deposit Plan are as follows:

• Land at North West Barry – 376no. units;
• North of Dinas Powys – 250no. units;
• Land at Readers Way, Rhoose – 520no. units;
• Land at Church Farm, St Athan – 532no. units; and
• Land to the West of St Athan – 600no. units.

We object to the current housing supply to allocate 2,278no. (65%) of units across strategic sites, as this makes for a risky and unrobust strategy for delivering housing, and in turn, meeting the identified housing need over the Plan period.

As stated in previous representations, there is concern that the proposed timing and phasing of the proposed Key Sites is unrealistic and unrobust, and in turn, undermines the soundness of the Plan, given the heavy reliance on Key Sites delivering new homes across the Plan period. Whilst it is not disputed that the sites would have gone through rigorous assessment to inform their proposed allocation, the timescales for securing planning permission (with all associated conditions discharged) is considered to be unachievable. This is particularly the case for the following timescales that are set out in the Housing Trajectory that underpin the Plan:

• "Time period of pre-application discussions/PAC consultation" – 4 months

• "Time between submission of planning application and determination" – 6 months
• "Time taken from planning consent to the discharge of relevant conditions to enable site construction" – 4 months

It is considered that the above timescales are fundamentally unrobust, and result in a distorted position of housing sites over the RLDP Plan period. It is not considered that these reflect or are informed by the timescales that are currently being incurred for planning applications submitted for major housing sites across Wales. It is rather the case that such applications would typically be determined 1-2 years following submission, given that there are a wide range of stakeholders involved in the determination of major planning applications – which often adds to the delays associated with the determination of such applications.

It is equally the case that the assumptions in the trajectory are solely based on expected timescales for processing

formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission.

It is assumed that these timescales have not considered that such major developments can be subject to the need to undertaking and submitting an Environmental Impact Assessment (EIA), which adds another layer to the determination of any planning application – given the additional considerations that form part of this process. As such, any site subject to EIA would very likely result in further delays extending beyond the timescales set out in the trajectory. Equally, as set out above, the preparation of an application subject to an EIA requires even more detail and assessment, which only further adds to the preparation stage (which has not been factored into as part of the trajectory). Accordingly, it is not considered that the trajectory contains any contingency if any site is required to undertake EIA as part of their application.

For the reasons stated above, it is unlikely that the sites will yield in full, particularly those sites which are expected to deliver housing right up to the final year of the Plan period ('Land at Readers Way' and 'Land to the West of St Athan'). These sites do not allow for any 'slippage' should any delays arise through the development management process (which for the reasons set out above, will very likely be the case), and as such, a gap in housing delivery will be brought about as a result of these sites not yielding in full.

Given the proposed ambitious timescales set out for the delivery of the Key Sites, it is considered the housing trajectory is unrobust, and in turn, undermines the soundness of the Plan as a result. A change in strategy should be pursued whereby a greater proportion of small to medium sites are allocated for housing in the Plan period, which are more likely to fully yield given that such sites are subject to less assessment and consideration compared to strategic sites. This would make for a more robust strategy, where a greater number of small to medium sites can deliver housing in the short and medium term of the Plan period, whereas the strategic sites represent a more longer-term strategy to deliver housing – which would then spill into the next Plan period.

Accordingly, we object to the Deposit Plan in its current form, where there is an overreliance on housing need to be met through the delivery of the Key Sites, which we consider to be unrobust, and undermine the integrity and soundness of the Plan. The current strategy of the Plan is at significant risk of not delivering the level of housing expected based on the sites allocated, as least as swifty as identified in the housing trajectory. Should no change be made to the Plan to address the above issues, then it is extremely likely that the Plan would 'fail' in meeting the identified housing need.

Windfall Sites

It is noted that the RLDP is made up of the following:

• Existing land supply (3,838 units)
• Windfall sites (1,303 units)
• Allocated sites (3,521 units)

Para 6.69 states that "Analysis of historical delivery of housing indicates that on average small windfall sites (sites of less than 10 dwellings) have provided some 53 dwelling completions per year, and large windfall sites (10 dwellings or greater) contributed on average 80 dwellings per year. Overall, it is projected that windfall sites could contribute a further 1,303 dwellings over the remainder of the plan".

As set out in our previous representations to the Housing Trajectory, we would object to the expected numbers of completions expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan – which is discussed in greater detail later in this submission. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated – including any windfall sites.

St Athan Train Station

The RLDP Sustainable Growth Strategy comprises six key elements, of which the following is set out in respect to the allocation of new housing growth in the Authority:

"3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links."

The strategy outlines that a feasibility study for a station in St Athan had been undertaken in 2022, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' and 80no. units attributed to 'Former Stadium Site, adjacent to Burley Place' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,263no. homes to be delivered in St Athan over the Plan period.

It is now the case, however, that the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales – as confirmed in the 'Today, Tomorrow, Together: A vision for rail across Wales and Borders' (February 2026) recently published by Transport For Wales. This paper acknowledges that a new railway station at St Athan would represent a longer term opportunity, and therefore, will not be delivered in the short term / within the Plan period of the emerging Plan. Equally the Council have not provided any evidence to contradict this, and therefore, it is very unlikely that any new train station will be delivered in St Athan over the Plan period. This brings about significant questions regarding the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that the sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,263no. homes (36% of the Plan's new housing allocations) are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add further sites for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

In terms of the expected delivery of the Key Sites in St Athan, it is noted that the trajectory identifies that for the majority of the Plan period, both sites will be delivering 80no. dwellings per annum on each site (equating to 160no units in total). Whilst these are two separate sites, we seriously question the realistic prospects of the significant number of

homes being built simultaneously on two sites in proximity to one another – given the considerable logistical issues that would be brought about.

Accordingly, it remains that there are serious questions regarding the suitability and acceptability of the proposed allocations at St Athan, which do not accord with the strategy adopted for the RLDP – to focus housing growth on settlements that are supported by railway stations. Moreover, the scale of development proposed at St Athan is also not considered to be proportionate, with a significant number of homes delivered in a location not served by a railway station.

Rolled forward LDP Sites

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current Plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application

submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of 'soundness', and risks rendering the Plan unrobust.

Housing Delivery Rate Assumptions

As set out in our previous representations to the Housing Trajectory consultation, we have considerable concerns in relation to the proposed delivery of the sites identified in the trajectory – which we do not consider are robust or reasonable.

Appendix 1 of the Deposit Plan sets out the development trajectory bar chart – which illustrates the proposed delivery of housing, on a per annum basis, over the Plan period.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)
It is our view that the trajectory makes for an unrealistic and unrobust delivery rate of housing, which does not reflect the pattern of housing completions in the Vale of Glamorgan. We therefore have concerns regarding the soundness of the trajectory, not least that there remain significant uncertainties as to the delivery of the Key Sites (as discussed earlier in these representations).

Firstly, the graph / trajectory illustrates a large 'spike' in terms of housing delivery in the year 2027-28, which is considered to be a marked and pronounced step change in the rate of delivery. This envisages / relies on a significantly higher rate of delivery than previous years in the Vale of Glamorgan (2021 through 2021 – as depicted by the green columns). It is considered that this level of delivery is unlikely to materialise, not least given prevailing market

circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions from 2021 - 2025 has been approx. 400 - 500 units, however, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100% relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

It is also the case that the anticipated delivery of housing fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren't spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed, in the final year, the level of completions are expected to be lower than the period 2021-2025.

Accordingly, we consider that the housing trajectory, as proposed, is entirely manufactured and unreflective of the past completion rates, as well as the recent published completion rates provided by Welsh Government recently in August 2025. As set out in our previous representations, it has been evidenced that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1: 'New House Building: April 2024 to March 2025'
As identified in the graph above, in 2024-25, 4,631 new dwellings were completed, which represents 3% fewer than the previous year. This figure represented the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed) The New Housing Pipeline Report Quarter 3, 2025 Report (December 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 7% during the third quarter of 2025, extending the decline seen during the first half of the year. At 45,075, the number of units approved was 34% down on the third quarter of 2024 and the lowest quarterly total since 2012 Q2. At 146,798, the overall number of units approved during the first nine months of 2025 was 25% lower than a year ago.

HBF Graph Illustrating Residential Approvals (2006-2025)

The above graph clearly shows a pronounced downward trend in the number of residential planning approvals over the period, particularly with a sharp decrease seen since 2020. Further, the HBF document 'Increasing Housing Supply in

Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

More recently, the Welsh Government has released its new estimates of housing need (Estimates of Additional Hosing Need: 2025-based – February 2026). The estimates show how many new homes need to be built over the next twenty years to address existing unmet need as well as newly arising need. The figures set out that around 8,700no. new homes a year are needed over the next Senedd term up to 2030 to meet new housing need. Additionally, there is an unmet need for 9,400 affordable homes.

Overall, this represents more than double 2024/25 levels of supply, where just 4,638 new homes were built.

HBF: Estimates of Housing Need

HBF: Actual Delivery vs Estimates of Need

The above graphs unequivocally evidence that historical rates of delivery of housing in Wales has remained low, and moreover, significant numbers of housing need to be allocated in order to meet the estimate of need. It is not

considered that the housing trajectory, in its current form, is robust to meet the housing need over the Plan period, given the uncertainties of the Key Sites, and the level of housing delivery that has been identified for the Plan.

Affordable Housing-Led Sites

HG4 - Rural Affordable Housing Led Sites

Policy HG4 of the Deposit Plan identifies four sites to be allocated as affordable housing-led sites, totalling approximately 122 dwellings within the plan period. Given the target levels of achieving 3,070 affordable dwellings over the course of the Plan period (up to 2036), it is not considered that this policy goes far enough to address the target and level of affordable housing need.

It is noted that the number of units identified for each site relate to the 'total' number of units delivered, as opposed to the affordable housing provision. Accordingly, it can be assumed that circa 50% of each allocation will comprise affordable units (given each site is affordable-led), which would equate to a total provision of circa 61no. units. The contribution from the affordable housing-led sites would only equate to 2% of the total need (3,070no. units). Even when coupled with the affordable housing provision from open market sites and 100% exception sites, the total delivery of affordable housing will still be nowhere near enough to meet the overall affordable housing need over the Plan period. Accordingly, it is considered that inadequate provision has been made for such sites.

Insofar as to the sites chosen and allocated are concerned, it is clear from reviewing the Stage 1 and Stage 2 Candidate Site Assessment that the allocated sites HG4(1) – (4) were not considered acceptable due to being outside the strategic growth areas, and were considered to be unacceptable intrusions into the open countryside. After being resubmitted as affordable housing-led sites, the sites were allocated, some with a smaller area in order to accommodate less dwellings in total.

The sustainable credentials of the sites allocated is not disputed, and it is acknowledged that these minor rural settlements have the ability to accommodate further growth, in the form of affordable-led housing allocations. However, it is considered that the should also form an allocation as part of this policy, given its high sustainability credentials and its appropriate location to accommodate a suitable level of development. Please refer to the previous representations made to the Housing Trajectory Consultation (dated 17th October) for further, more detailed comments regarding the above sites.

The LHMA 2023 shows that there is a need for 124 affordable homes in the St Brides Major local housing market area (which Ogmore is located within). As such, there is an identified need for affordable housing in this area, something which the site could address through an allocation.

It is questionable whether Wick has the capacity to accommodate 50 new dwellings, given the sustainability and rural nature of the area. As a result, it is suggested that the number of homes allocated in Wick is reduced and that a further allocation in St Brides Major is secured, in order to facilitate supporting the delivery of affordable housing through the housing market area, rather than in one minor rural settlement. The sustainability of Ogmore has been assessed, both by the Council through the Sustainability Appraisal and again, through our assessment of the site.

Securing further delivery of Affordable Units

As set out above, the affordable housing-led allocated sites only provide 122no. affordable dwellings, which comprise 4no. allocated sites that are expected to deliver approximately between 20 – 50 dwellings. However, the RLDP sets a

target of 3,070 affordable homes to be delivered in the Plan period. This means that affordable housing-led allocations make up less than 4 % of the target provision and will only make provision for 2% of the targeted number. We would therefore object to the sites included within Policy HG4 and would suggest that more sites should be allocated as part of the policy in order to secure delivery of a higher number of affordable housing units to mere the target.

Whilst it is acknowledged that the Key Sites will provide for a significant proportion of affordable housing, as set out above in these representations, there is serious concern regarding the deliverability of these sites, which would result in a significant gap of affordable housing delivered.

A greater number of affordable housing-led sites allocated would ensure there is sufficient contingency built into the Plan, to ensure that the overall affordable housing need is met over the Plan period. Failure to do so would result in affordable housing need being unmet, with demand continuing to outstrip supply.

Previous representations to the Preferred Strategy (dated 14th February 2024) provided comment on the sustainability scoring of Ogmore and the proposed site. As outlined within these representations, it is considered that the site (ID xxx) represents a sustainable, deliverable and acceptable site. The site is within a maximum of a 22- minute bus journey to a every key service listed, due to the proximity of the site to settlements such as Bridgend. Due to the availability of frequent bus services, and active travel links, these key services are readily available to access for any residents within Ogmore By Sea without the need to travel by car. The site is located within 5 miles of Bridgend, and within a maximum 22-minute bus journey of the following services:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre for various Retail Services

Moreover, Ogmore has benefitted from the recent development of the Ogmore By Sea Village Hall, which provides space for community activities and events to take place. The hall also includes a coffee shop (Welsh Coffee Company), which only adds further to the daily services provision available within the settlement. Access to the hall and coffee shop is directly provided for pedestrians from the Main Road, which allows for direct access from the site.

Accordingly, the settlement of Ogmore represents an acceptable location to allocate an affordable housing-led site, given the access to existing services and facilities that would serve future residents of the site.

It is acknowledged that the site also lies within the Glamorgan Heritage Coast and this point is addressed further below.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of Ogmore By Sea, support the surrounding settlements, and the Plan area as a whole. As such, the site should be considered further.

Comments on Specific Policies

HG5 - Affordable Housing Exception Sites

Given the unmet need and extant backlog of affordable housing, as identified within the LHMA (2023), it is noted that an Affordable Housing Exception Sites policy has been adopted in order to assist in the delivery of affordable housing. Policy HG5 sets out the specific criteria where proposals for 100% small scale affordable housing developments will be permitted outside settlement boundaries. The current policy wording for the Affordable Housing Site Exception Policy and the criteria listed out in the policy is generally supported.

That said, it is noted that a ‘cap’ of 10 dwellings (as referenced within supporting text Para 6.140) is set. This should be amended due to such a ‘cap’ limiting the flexibility of the policy, in particularly for sites coming forward as part of this policy in Minor Rural Settlements.

As such, we would suggest that supporting Para 6.140 should be amended in order to allow for further flexibility for sites in Minor Rural Settlements to come forward and to deliver affordable housing, given that the criteria set out in the policy would already protect and restrict the extent of any development as it stands. Therefore, the proposed amendments to Para 6.140 are outlined below in red:

6.140 “For the purposes of this policy, ‘small-scale’ will generally mean no more than around 10 dwellings on sites adjoining Minor Rural Settlements. In Primary Settlements outside the Strategic Growth Area, proposals for more than 10 dwellings may be acceptable where required to meet a specific need and where the number of dwellings is proportionate to the size of the settlement. In assessing the scale and extent of any proposed local needs housing, consideration should also be given to affordable housing already planned in the ward or nearby area, including sites with existing

planning permissions and those allocated in the RLDP. The size and type of affordable housing proposed should reflect the identified local need in the area."

The above suggested wording would achieve a more flexible policy, which would allow for a variety of scaled applications to secure planning permission for solely 100% affordable housing across the Authority area. This greater flexibility would enable the policy to make a significant contribution towards meeting the affordable housing need – which, as set out earlier is in considerable need.

Policy DNP3 – Glamorgan Heritage Coast

Given that the site is located in the Glamorgan Heritage Coast, it is noted that the following policy is of relevance to any future development on the site. Criteria 4 of Policy DNP3 states:

"The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development that accords with National Policy."
It is also noted that supporting Para 6.422 "In seeking to protect the Glamorgan Heritage Coast, the Council acknowledges that there are some built up areas within the boundary, including the Minor Rural Settlement of Ogmore. In addition, the Vale of Glamorgan rail line crosses part of the Heritage Coast designation in the location where a new station at St Athan is proposed. Whilst being mindful of the need to protect the special qualities of the Glamorgan Heritage Coast, the Council accepts that development within these areas is appropriate, subject to relevant policies of the Plan"(GJP emphasis).

We would offer general support for this policy, and consider this to provide flexibility which allows for certain forms of development. However, we would suggest that the policy wording should be amended to reflect that 'housing' should be supported in the Glamorgan Heritage Coast, providing that the policy exceptions are met. Therefore, the following amendment is proposed as part of the policy should be changed to include "small scale housing" or something similar. The proposed amendments to Policy DNP3 are outlined below in red:

"The special environmental qualities of the Glamorgan Heritage Coast will be conserved and enhanced. New development will be restricted to:
4. Other appropriate and sustainable development, including small-scale housing proposals that accords with National Policy."

Again, this would ensure that suitable housing developments can be delivered in the Plan period, to meet the housing needs of the Vale of Glamorgan – particularly in respect of affordable housing.

SECTION 3. Suitability of the site for development

The site promoter objects to the overall assessment of the site, in that it is not considered suitable for further development in the Plan. The promoted site has undergone extensive scrutiny and appraisal at a high level to ascertain the qualities of the site, in light of all identified material considerations which relate to the proposals.

The delivery of the site will yield much needed housing (including Affordable housing) and contribute to the overall supply in the new Plan period, whilst making effective use of a suitably located site for residential development.

Moreover, as set out in 'Annex 2' of our representations, the site has overcome the 'constraints' set out in the Candidate Site Assessment undertaken for the site, which demonstrates that the proposal is both acceptable and deliverable.

SUMMARY AND CONCLUSIONS

In summary, the site promoters:

• Object to the distribution of growth proposed for the Plan area, with a more balanced and equitable distribution of housing sites required in order to meet the identified housing need;
• Object to the level of growth identified for the Plan period;
• Object to the housing trajectory that underpins the delivery of housing within the Plan period – which is considered to be unrealistic and unrobust, leading to serious uncertainty regarding the "soundness" of the Plan;
• Object to the over-reliance on Key Sites and Rolled Forward Sites in making up the Plan's housing land supply;
• Object to the scale and timing of delivery of sites in / around St Athan – all of which are predicated on railway station provision which will not be realised in the Plan period;
• Object to the under-provision of sites under Policy HG4 – Rural Affordable Housing-Led sites, not least given their extremely limited contribution to the targeted need for affordable housing;
• Object to Policy DNP3 – Glamorgan Heritage Coast, given the lack of recognition for the potential for small-scale housing proposals;
• Object to the current wording of the HG5 Policy 'Affordable Housing Exception Sites' which requires greater flexibility to play an important role in delivery much-needed affordable homes across the Authority; and
• Object the Council's assessment that the site is not considered suitable for development.

The site and proposals are consistent with the RLDP strategy, other Vale of Glamorgan strategies, and the requirements of Planning Policy Wales and Future Wales. It will make a significant contribution to the Vale's identified housing requirement in the RLDP period and will provide for a wide range of uses that will support the wider community whilst embodying principles relating to placemaking and the well-being of future generations.

The site has no fundamental constraints and has the ability to deliver significant economic, social and environmental benefits for the benefit of future residents and the existing local community. The site is demonstrated to be viable, being able to deliver policy-compliant levels of affordable housing and given its location within a strong market area, will benefit from high delivery rates.

ANNEX 2
SECTION 4. A summary of the suitability of the site for development including a Response to the Candidate Site Assessment

This section of the overall representations to the Deposit Plan is to respond to, and address, the Council's assessment of the site.

While the issues the Council have raised in their assessment of the site have been addressed and discussed within the representations made at the Preferred Strategy stage of the Plan, a similar 'scoring' exercise has been undertaken as part of the evidence base for the Deposit Plan. As such, it is still pertinent to consider and respond to the Council's assessment of the site as part of these representations

The Detailed Site Assessment for Land at Hazelwood, Ogmore By Sea (Site ID: 3855) sets out that the position of the site at the Deposit Stage is as follows:

"The original site as ruled out as the development would represent unacceptable intrusion in to the open countryside. Whilst the site has now been identified for an affordable housing led development, the original reason for ruling it out still remains."
In terms of the assertion that "the development would represent an unacceptable intrusion into to the open countryside", this is strongly disputed, in that the development of the site would represent a natural rounding off of the existing settlement boundary. An extract of the site relative to the settlement boundary is provided below, which clearly shows that the development of the site would not extend beyond the existing settlement pattern that exists in Ogmore.

Site Outlined in Red and Settlement Shaded in Blue
As clearly demonstrated in the above mapping, the site would extend no further eastwards than the existing housing area to the south of the site. Equally, the site would not be extending any further north than the existing settlement pattern in Ogmore. This position is further supported by the wider aerial view of the site provided overleaf:

Wider Aerial View of Site Outlined in Red and Settlement Shaded in Blue

In summary, it is considered that the proposed allocation of the site represents a logical rounding off of the existing settlement, as depicted in the mapping provided above – where the site follows the existing envelope of the settlement. The site does not extend any further eastwards than the established built form located immediately to the south; indeed, it sits comfortably within the same development line.

As such, it cannot be considered that the site represents an 'intrusion' into the countryside, as the site would be visually and functionally related to the settlement. It therefore follows that the site would be read as part of the settlement, and not the wider rural landscape.

Candidate Site Assessment

The Detailed Site Assessment undertaken by the LPA includes a summary and assessment of the 'scoring' system used at the Preferred Strategy stage. A comparison between the site assessments undertaken at both the Preferred Strategy stage and Deposit Plan stage is provided overleaf for reference.

Site Assessment at Preferred Strategy Stage Site Assessment at Deposit Plan Stage
As demonstrated above, there are no changes to the scoring attributed to the site. Detailed submissions were made on the previous assessment undertaken by the Council at Preferred Strategy stage, and as such, should be read in conjunction with this submission (see Appendix A).

Sustainability

Notwithstanding the above, it is considered that the site represents a more sustainable location than what was

previously assessed at Preferred Strategy stage, in light of the Ogmore by Sea Hall development. The Hall acts as a community facility, whereby the space is available for hire by local community groups such as birthday parties, weddings, group meetings, and other such similar uses. Moreover, a café (Welsh Coffee Co) is located within the premises which sells both food and drink.

The hall and café are within walking distance to and from the site, where new access facilities have been implemented from Main Road directly to the building, to allow access for pedestrians and cyclists. This is illustrated in the image below:

Walking and Cycling Facilities

The Tusker Rock pub and post office are also located along Main Road, all of which are within walking distance to the site.

Accordingly, the site is well served by new amenities (i.e. community hall) that comprehensively improves the sustainability of the site / settlement, and in turn, improves the sustainability credentials of the site promotion. It therefore follows that the site represents an acceptable location for residential development, and the site should be looked upon favourably accordingly.

It is also the case, as set out in previous representations, that the site is within a maximum 22-minuted bus journey of the following services and facilities:

• St Brides Primary School;
• Brynteg Comprehensive School;
• Bridgend College;
• Riversdale Surgery; and
• Bridgend town centre.

As such, key services and facilities can be access by sustainable travel over and above the existing level of provision available in Ogmore By Sea (as discussed above).

Accordingly, the relevant 'red' scorings in the Council's assessment should be updated to reflect the site's suitability and sustainability to accommodate the proposed residential development of the site.

Glamorgan Heritage Coast

Insofar as to the position regarding the site's location within the Glamorgan Heritage Coast, detailed submissions are made not only in the Preferred Strategy representations, but also in Annex 1 of this submission. In short, given the pressing need for such development (particuarly affordable housing) to come forward in the Plan period to meet ever-increasing needs, development of this nature should be considered more favourably – not least that, as outlined in this Annex, the site would not extend any further that the existing settlement boundary.

Accordingly, the site would be perceived to form part of the settlement of Ogmore By Sea, and not the wider landscape, and therefore, would not have any detrimental impact on the Heritage Coast in any respect. The scoring should be amended accordingly to reflect this position.

Climate Change

As outlined in previous representations, the development will incorporate climate change measures, such as EV charging points, PV panels, as well as adopting sustainable materials for construction whilst maximising the potential for the dwellings to be energy efficient. Accordingly, the development will be built to high sustainable standards, and therefore, the scoring of the site should be amended as a result.

Summary and Conclusion

It has been evidenced above that there are no fundamental constraints at, or associated with the site, that would preclude the site coming forward for development in the RLDP period.

To conclude, the settlement, location and site are inherently suitable and deliverable, and will make a significant contribution to achieving and realising the housing and economic development needs of the Vale of Glamorgan.

Summary of These Representations

In short, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised below in respect to the trajectory information published regarding the

soundness and robustness of this information (and it's consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Preface

This Submission sets out the detailed case in support of these representations. The representations are structured as follows:

1. Procedural Consultation Matters;
2. Timing Assumptions underpinning the Trajectory;
3. Housing Delivery Rate Assumptions;;
4. Status & Standing of Sites included in the Trajectory;
5. Key Sites;
6. St Athan Train Station;
7. Geographic distribution of the 'new' sites / provision;
8. Detailed comments in respect to 'new' sites;
9. Conclusions Procedural Consultation Matters

Firstly, we do not consider that the consultation on the Housing Trajectory information has been procedurally undertaken appropriately or suitably.

Only 14 days have been afforded to parties to make representations on the information provided. This is despite new sites being introduced (at this late stage) i.e. Land South of Clive Road (identified in Table 4), as well as a number of affordable housing led housing sites being introduced (i.e. those outlined in Table 5). This does not provide an adequate process or timescale for objectors to scrutinise the published content, and to make comments on sites which have been presented for the first time at a late stage in the process.

As part of these representations, we will be making brief comment on the sites which have not been previously consulted upon, namely:

Other Housing Allocations
• Land south of Clive Road, St Athan;

Affordable Housing Led Sites
• Land at Heol Fain, Wick;
• Land west of Maendy Road, Aberthin;
• Land Noth of West Winds Business Park, Fferm Goch; and
• Land to the East of Colwinston;

It is considered necessary to comment on these sites, given that they form an important and critical part of the housing trajectory, and by association in the Council and Plan reaching their targets. Moreover, these sites have not been consulted on previously. Accordingly we consider it necessary to pass comment on these in order to ensure that the consultation is fair and robust.

As well as limited time given to comment on the information contained within the Housing Trajectory, the LPA have failed to set up a Housing Stakeholder group to agree and discuss the trajectory information and data – with the cover email to the consultation (dated 3rd October 2025) stating "it is considered that it would be the best use of stakeholder time to conduct this engagement via email, particularly as many of the forecasts have been developed in consultation with site promoters including developers and their agents".

We submit that the stakeholder consultation has not been a transparent nor robust consultation process, given that the Development Plans Manual states at Para 5.66 "A housing trajectory must be prepared to support the Deposit Plan. In order to generate a housing trajectory and associated phasing tables it will be necessary for LPAs to engage with stakeholders through a Housing Stakeholder Group. This will ensure that the timing and phasing of sites is robust and based on up to date information". Given that this has not taken place, we would raise fundamental concerns that the consultation of the trajectory has not adequately taken place as per the relevant guidance. Afterall, the guidance stresses that a Group should be formed as a necessity. Accordingly, there has not been an adequate process and opportunity to review and comment on the information published, including in respect to the other sites have been introduced at this late stage.

Timing Assumptions underpinning the Trajectory

The assumed and factored in timescales of the various stages of bringing forward sites i.e. the pre-application stage, the planning application process, and the discharge of condition process outlined in the trajectory are considered to be fundamentally inaccurate, and result in a distorted position of the delivery of housing sites over the RLDP Plan period. The assumptions are far too ambitious, and without evidence / are not comparable with the timescales being incurred in processing such stages at the Development Management stage(s).

Specifically, we raise objection to the following timescales which are considered to be extremely ambitious and unrealistic:

• “Time period of pre-application discussions/PAC consultation” = 4 months
• “Time between submission of planning application and determination” = 6 months
• “Time taken from planning consent to the discharge of relevant conditions to enable site construction” = 4 months

In our experience, having submitted a significant number of major and other applications for housing and other forms of development in the last 1-2 years to the Council (and elsewhere in Wales and England), it is extremely unlikely that major applications can be submitted, and planning permissions granted, within the timeframes assumed by the trajectory. A wide range of stakeholders are also involved in the determination of major planning applications, which often adds to the delays associated with the determination of such applications. We would therefore consider that a time period of “6 months” given to all major applications in the housing trajectory is not feasible, and distorts the trajectory timescales for the remaining Plan period.

The assumptions in the trajectory are also solely based on expected timescales for the processing of formal submissions made to the Council, and do not factor in the timescales associated with, and needed for, the preparation of the material for submission (i.e. pre-application enquiry submissions / planning application / discharge of condition details etc). When factored in these will elongate the timescales for bringing forward schemes considerably.

Moreover, it is common practice for larger housing sites and major applications to have a range of pre-commencement conditions attached to a permission once granted. Again, we would raise concerns with the timescales indicated in the trajectory related to this part of the planning process. It is highly unusual and questionable that any technical work required by these conditions (usually relating to drainage and highways matters) would be instructed, completed and submitted within 2 months, and for these to then be signed off / approved in a further 2 months. There are also other technical matters and necessary approvals falling outside of, and over and above, the planning system, such as SAB, s.106, s.38 and s.278 agreements, timescales for which have not been accounted for – and all of which are rarely completed within “4 months” as indicated.

It is therefore highly doubtful that the timescales legislated for in the trajectory for the various stages pre-construction are achievable – with no information about these proposed timescales outlined within the supporting text of the Housing Trajectory. We would therefore raise considerable concerns and objections to these as they stand without full evidence to fully show how these have been calculated, and without there being considerable (and necessary) adjustment to the timescales indicated and factored in.

We would therefore object to the timescales indicated in the ‘Timing and Phasing of Sites’ table, given that the delivery start dates will be pushed back further into the Plan period. Accordingly, and as a result, the Plan is at risk of not delivering the level of housing expected based on the sites allocated, at least as swiftly as is set out in the trajectory.

Housing Delivery Rate Assumptions

We would also raise considerable doubt over the proposed delivery of the sites identified in the Housing Trajectory - which we do not consider are robust or reasonable.

The development trajectory bar chart set out in the consultation material (extracted below) anticipates and legislates for a number of critical events and circumstances – all of which are considered to be unrobust and unsound.

Extract of Housing Trajectory Graph (annotated by GJP – red dotted line)

Firstly, a large ‘spike’ (material increase) in housing delivery is factored in to take place in 2027 – 2028. This is a marked and pronounced step change in the rate of delivery, and envisages / relies on a significantly higher rate of delivery than previous years in The Vale of Glamorgan (2021 through 2025 - as depicted by the green columns). This is considered extremely unlikely to materialise, not least given prevailing market circumstances, past rates of delivery on the ground, and also in light of levels achieved across Wales and the UK in general.

The published trajectory shows that the average level of completions in The Vale of Glamorgan from 2021 - 2025 has been approx. 400 - 500 units. However, the chart shows that from 2027 – 2028, completions are expected to rise to approx. 1,000 units per year. The expected delivery levels in the trajectory therefore show and assume a doubling in delivery rates and unit numbers (an increase of approx. 100%relative to past rates). There is no clear evidence as to how this level of completions can be achieved let alone guaranteed. This is the case in particular given that the forthcoming years (2025-2027) are expected to see performance (yield) drop significantly (delivery rates in 2025 – 2026 and 2026 – 2027). The chart shows only approx. 200 units being delivered over these years. It is therefore unclear how completion rates are expected to rise so quickly (from 200 in 2025-26 to 1000 in 2027-28), and by such a significant amount. The assumptions in the trajectory are wholly unrobust in our view.

The anticipated delivery of housing also fails to be consistent within and across the Plan period. It is unclear as to why completions rates aren’t spread out more evenly throughout the Plan period - to ensure a robust and most realistic housing trajectory until 2036. By comparison to the marked increase in the rate of delivery between and over the

period 2027 to 2031, there is then a marked fall-off or drop in delivery towards and by the end of the Plan period. Indeed,

in the final year, the level of completions are expected to be lower than the period 2021-2015.

To summarise, we consider the defined position to be wholly manufactured and unreflective of the past completion rates, as well as the recently published completion rates provided by Welsh Government recently in August 2025. In the Welsh Government Statistics Document ''New House Building: April 2024 to March 2025', information on the number of new dwellings started is provided, where building has commenced and those completed for April 2024 to March 2025. Figure 1 provides a graph showing starts in the last 10 years, and it is clear that there has been a general decline in the number of new dwellings started and completed.

Description of Figure 1:.'New House Building: April 2024 to March 2025'
In 2024-25, 4,631 new dwellings were completed, 3% fewer than in the previous year. This was the second lowest number on record, with the lowest number recorded in 2021-22, a year heavily affected by the coronavirus (COVID-19) pandemic (in 2021-22, 4,616 new dwellings were completed). The New Housing Pipeline Report Quarter 2, 2025 Report (September, 2025) published by the HBF evidenced that the number of residential units approved in the UK fell by 6% during the second quarter of 2025, continuing the decline of approval during the first three months of the year. Wales saw one of the largest declines in the UK in approvals with a decline of 29%.

Further, the HBF document 'Increasing Housing Supply in Wales' (4th September 2025) clearly shows that The Vale of Glamorgan has not met the housing delivery requirements in recent years in 2023 – 2024 – along with every other authority in Wales (except Newport). Accordingly, this further adds to the argument that historically The Vale (and most other authorities) have underprovided. This adds considerable uncertainty on the assumed transformation in yield and delivery as built into the trajectory.

Graph: Housing Delivery as a proportion of annual housing requirement in Wales per Authority

The Home Building Sector Skills Plan (Aug 2025) published by the HBF also identified the following issues with the workforce to bring forward built development in Wales:

• "A shortfall in numbers entering roles from the education system;
• An ageing workforce: 25% of the home building workforce is aged over 50, meaning the sector is facing an impending retirement cliff edge;
• Challenges attracting a wider talent pipeline into the sector;
• A lack of understanding of critical future skills needed, and direction from the Future Homes Standard; and
• Output within the sector fluctuating with demand and economic pressures, leading to additional pressures in recruitment and training".

It is not considered that in the next 1-2 years that any of these issues can or will be substantially corrected – at least sufficiently so to allow for, and enable, the planned delivery rates of new housing completions to be as high as < > 1,000 homes in one year (and for four consecutive years at that).

We would therefore object to the proposed numbers of completion expected during the Plan period, given that there are a number of issues with delivering housing in Wales and given past completions rates for The Vale of Glamorgan. Again, this results in the Plan being at risk of not delivering the level of housing expected based on the sites allocated.

Status & Standing of Sites included in the Trajectory

The proposed land supply within the housing trajectory includes provision for 'rolled forward' LDP sites, which contribute to the total of 'Proposed Additional Housing Allocations' forming part of the housing supply. Specifically, a total of 1,242no. units have been identified as additional housing allocations, of which 959no. are expected to be delivered on the rolled forward LDP sites. As such, these sites are to provide for a significant proportion of additional housing in the Plan period (specifically circa 77%).

The Development Plans Manual (DPM) sets out that allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan. The DPM outlines that "there will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." The below table included in the consultation document provides a breakdown of the rolled forward LDP sites, and in particular, sets out the status of each site:

The above table evidences that the current LDP has under delivered in regard to its targeted unit number of the Plan period, given that these sites did not yield any housing over the current plan period. This is further exacerbated by the Land Bank sites that have also not delivered any housing across the existing LDP period, amounting to 1,860no units. Accordingly, when considering the non-delivery of both rolled forward LDP sites and Land Bank sites, this amounts to an approximate shortfall of 2,189 homes being delivered, or 33% of the total housing supply identified for the current LDP (8,525no. dwellings).

It is therefore considered that, as a minimum, the units carried over from the LDP (without planning permission) should be a surplus to the housing supply proposed for the RLDP, as opposed to being relied on to deliver the housing need over the Plan period. This is particularly the case for the two sites (Land to the west of Pencoedtre Lane, and Land between Northern Access Road and Eglwys Brewis Road) which do not currently have any active planning application submitted for their development. These sites total an amount of 370no. units to be delivered in the Plan period, which represents more than a third of the additional housing allocations to make up the housing supply.

As such, it is considered that the unmet need deriving from the existing LDP is still present – indeed it has grown, and will continue to do so, not least when considered in conjunction with the projected population growth over the coming years to 2036, and the aspirations for growth in the Plan's strategy.

Accordingly, in order to secure the targeted level of housing, a greater level of provision for new allocations should be applied in order to meet the housing requirement. This would bring about better certainty that the housing requirement is met by the housing supply over the Plan period, not least given that the current Plan failed in this respect. Without a re-apportioning of the housing supply, it is considered that the Plan would heavily rely on the contingency (i.e. rolled forward LDP sites) coming forward in the Plan period, yet there is uncertainty that these will yield in full over the new Plan period. This raises issues of ''soundness'', and risks rendering the Plan unrobust.

On this basis, we would object to the Plan if the provision of housing is not adjusted to rebalance the provision to include new allocations in lieu of rolled forward LDP sites in the housing supply.

Key Sites

As set out in previous representations at Preferred Strategy stage, it is considered that the housing supply relies heavily on the delivery of the 'key sites' to deliver housing (and meet need) over the Plan period. The total number of housing units attributed to key sites amounts to 2,278, which equates to over 25% of the total provision in the Plan period.

As detailed above, we consider there to be concerns regarding the proposed 'Timing and Phasing of Sites' table included in the Housing Trajectory which we consider are not reflective or accurate and will therefore have the effect of delivery start dates being much later into the Plan period than anticipated. The result of this will be that the Plan will be at risk of not delivery the level of housing expected and needed. Moreover, the Housing Trajectory Graph presents an overly ambitious level of housing completions over the Plan period - which the Council consider will be markedly higher than the average levels experienced in the last five years. Again, for the reasons set out above, we consider that these rates of expected completions to have no evidence supporting them, and to be unachievable and unsound.

Insofar as to the removal of the previously proposed site 'Land at North East Barry', this site was expected to deliver 900no. units in the Plan period. Following its omission from the housing supply, other sites have been identified, which comprises the inclusion of a new key site (Land at North West Barry), 3no. non-strategic sites, and also affordable housing-led allocations. In terms of the quantum of development attributed to these new sites, this amounts to 659no. dwellings. This is some 250 units less than the 900no. homes that was previously attributed to 'Land at North East Barry'. Whilst it is appreciated that the number of homes forming part of the existing supply (completions, units with planning permission etc.) have increased since Preferred Strategy stage, there will be a net loss in market housing provision and delivery.

This position is made worse and compounded as a result of accounting for the affordable-led sites in making up the housing supply.

As set out within the Preferred Strategy, these sites are expected to deliver at least 51% affordable housing. These units are not open market units, and will not / cannot contribute to the supply of such housing. These units will contribute to the provision of affordable housing, and will go some way to meeting the acute need for such housing (albeit will not eradicate / address in full the well known and accepted considerable requirement). Accordingly it is considered that these sites should be in addition to the housing supply, as opposed to forming part of the provision. In turn, there would need to be an increase in allocations for non-strategic sites, to ensure that there is sufficient market housing delivery over the Plan period.

Were such changes to be made and introduced, this would achieve and assist realise a more robust and sound housing supply, which will ensure that the identified housing need is met / addressed over the Plan period. Without these changes it is considered that the housing supply is not sufficient, and inevitably, housing need will not be met within the Plan.

St Athan Train Station

As set out in the Preferred Strategy (para A3.29), the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. Accordingly, in line with the spatial strategy adopted for the RLDP (i.e. focus development around sustainable transport nodes), St Athan was identified as a 'Strategic Opportunity Area' to accommodate strategic growth – through the proposed allocation of two

key sites : 'Land at Church Farm' and 'Land West of St Athan'. These sites have been identified to deliver 532no. and 600no. units respectively in the Plan period. These are separate to, and are in addition to, the 51no. units that have now been attributed to the site 'Land South of Clive Road' in St Athan. Accordingly, in total, the Housing Trajectory makes a provision for a total of 1,183no. homes to be delivered in St Athan over the Plan period.

It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales. The focus in the first phase of such improvements across the region is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly,

it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

The strategy to allocate new housing growth is predicated on focusing residential development around sustainable transport nodes, and given that St Athan will be without any railway station in the Plan period, it is not considered that these sites align with the strategy of the RLDP. Accordingly, the wider Housing Trajectory is considered to be unsound, given that a total of 1,183no. homes are expected to be delivered in St Athan within the Plan period.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing in this location over and above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites - given their incompatibility with the core strategy of the RLDP.

We therefore consider the Trajectory to be both unrobust and unsound, and therefore, we object to the Trajectory in its current form accordingly.

Geographic distribution of the 'new' sites / provision

As a general and overarching comment in respect to the additional sites now included within the Plan, and forming part of the trajectory, (and a matter expanded upon when critiquing each of these sites in the next section to this submission), it is clear and evident that these additional sites have been positioned to settlements that have already, and recently, been attributed significant growth in the preceding Plan and plan period.

Significant allocations (which have also contributed to significant levels of affordable housing) have been realised and built out in locations (such as Wick and Colwinston). Notwithstanding this, two of the additional sites are now proposed for these recently expanded settlements. Given that the purpose of the affordable housing led allocations is to meet unmet affordable housing need, it is questioned why such new allocations are attributed to settlements that have already seen open market and affordable housing provision, as compared to other comparable settlements that have not received any growth whatsoever over a considerable period of time.

It is considered accordingly that the geographic positioning of these allocations is at odds with their underlying purpose - to meet unmet affordable housing need in communities that have seen no provision

Detailed Comments in respect to 'new' sites

Other Housing Allocations

Land south of Clive Road, St Athan

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

As set out at the outset of these representations, and whilst we note the findings of the Candidate Sites Assessment at Preferred Strategy Stage (i.e. Suitable for further consideration), we do not consider that the consultation on this site has been undertaken procedurally appropriately or suitably. We therefore consider the consultation on this site is "unrobust" and "unsound".

As set out previously, the strategy seeks to focus development around key sustainable transport nodes. The strategy outlined that a feasibility study for a station in St Athan had been undertaken, which identifies that a new station could be located in St Athan, subject to further investigation work. It is now the case that, subsequent to the publication of the Preferred Strategy, the proposed railway station at St Athan is not in the first phase of delivery for new stations in South Wales, where the focus is towards improving connectivity in east Cardiff, Newport, and Magor. Accordingly, it is very unlikely that any new train station will be delivered in St Athan over the Plan period, which significantly questions the suitability and acceptability of the proposed allocations set out above.

It is considered that there has been an overprovision for housing growth in St Athan generally, and this issue is now further exacerbated by the lack of any forthcoming rail provision. Given this, to add a further site for housing over and

above the original provision is considered to be unsound. As set out above, the justification to allocate sites at St Athan has relied heavily on the railway station being delivered in the Plan period, and as such, there are serious questions marks associated with the acceptability of the proposed allocated sites – given their incompatibility with the core strategy of the RLDP.

Affordable Housing Led Allocations Land at Heol Fain, Wick
A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below for ease:

Candidate Site Stage 2 Assessment (Site Ref. 404)

The findings of the Candidate Site Assessment for this site are noted. We are assuming the reason this site is proposed to be allocated is a product of the site promoters/developers heading the findings stated below, and changing the form of development to be in accord with this:

"A market housing led scheme would not be acceptable, but the site could be reconsidered as a small scale affordable housing led development subject to need and viability at a maximum of 50 dwellings. In accordance with the Settlement Appraisal Review, it is considered that Wick could potentially accommodate limited affordable housing led growth."

Whilst no clear deficiency exists in respect to the site, it is known that Wick has been subject to significant growth and expansion in recent years – not least by virtue of significant housing allocations in the settlement as part of previous plans.

To evidence this, 35% of the 124 units approved on the 'Rectory Field, St Brides Road' site (i.e. circa 43 units as per site allocation ref. MG(47) and PP ref. 2014/01424/FUL) were approved as Affordable Housing units. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Wick, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Land West of Maendy Road, Aberthin

'Land West of Maendy Road' has been registered as an Affordable Housing Led Allocation candidate site for the RLDP, however as far as we know from our review, there is no assessment and critique of this site. This site has not been included in the 'Candidate Assessment at Preferred Strategy Stage' (October 2023). As such, with an absence of publicly available information, it is not clear how the Council has judged this site against the criteria. This raises questions accordingly in respect to the "soundness" of a site which forms part of the intended housing land supply, and by association the trajectory. Without this, and without being consulted on (as others have been prior to this) we question whether this allocation is "sound" (i.e. its allocation is considered to be "unsound").

Land North of West Winds Business Park, Fferm Goch

The below sets out the candidate site stage two assessment of 'Land to north and west of Westwinds Business Park':

Candidate Site Stage 2 Assessment (Site Ref. 398)

As can be seen above, the site was not considered suitable for further consideration, with the site scoring negatively (red) in respect to a number of key factors. These include the following:

• Access to Retail;
• Access to Health Services;
• Sustainable Transport- Public Transport;
• Access/ Proximity to services and facilities conclusion;
• Climate Change; and

• Health and Wellbeing.

Given the fact the site scores red in 'Sustainable Transport – Public Transport', this shows the site is not served by public transport connections within 800m, as outlined in the key below:

Additionally, Policy SP7 (Sustainable Transport) of the Vale of Glamorgan Preferred Strategy states "New development

must support an enhanced transport network that increases the proportion of journeys being undertaken by sustainable travel modes". Additionally Objective 8 (Promoting Active and Sustainable Travel Choices) states "new development is directed to locations that are or can be accessible by a choice of modes of transport, including walking, cycling, and public transport."

It is well known that residents of affordable housing are statistically less likely to own private vehicles, making access to reliable and frequent public transport essential for ensuring equitable mobility. The provision of public transport infrastructure in close proximity to such developments is therefore a critical component in supporting access to employment, education, healthcare, and other key services, while also promoting sustainable travel patterns and social inclusion.

The site also scores red in respect to Access/Proximity to services, showing the site is greater than 1200m away from key services, as seen in the key below:

In respect of the above, Preferred Strategy 6.40 states the need "To ensure that new development takes place in locations that have the best access to a wide range of services, facilities, and employment opportunities, whilst minimising the need to travel, the distribution of growth is guided by the following settlement hierarchy". To further highlight the importance of both sustainable transport and proximity to services, the preferred strategy also states the need to "Facilitate the development of adaptable, accessible, well-connected communities that have a strong sense of identity, offer a sustainable range of services and facilities and are equipped with adequate infrastructure". In addition, Promoting Active and Sustainable Travel Choices outlines to "Promote and encourage the use of sustainable methods of travel, particularly active modes of transport, whilst simultaneously reducing the need to travel".

In light of the above, this site does not align with the aims and targets set out in the Preferred Strategy, as it fails to meet several key development goals set out. It should therefore not be considered suitable to be allocated for future developments. Its inclusion is therefore unsound.

Should this view be concurred with, 22 affordable units will be lost from the proposed affordable 122 units, and ultimately will be lost from the overall housing land supply. As stated in the draft housing trajectory "there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help sustain services and facilities within these rural communities". There is a clear possibility therefore that this proposed allocation is removed and/or not delivered as its inclusion is unsound as it does not align with the aims and targets set out in the Preferred Strategy - as it fails to meet several key development goals set out. A "small scale

affordable housing led development" which is needed to "respond to local affordable needs and help sustain services and facilities within these rural communities" will therefore not be provided for. This is clearly an issue.

When comparing this with 'Land at Hazelwood, Ogmore By Sea, the following is set out:

Access to Services and Facilities

This criterion has been assessed firstly on the location of the site proposal in terms of whether it is located within, adjacent to, or outside a settlement, and secondly the ease of pedestrian and cycle access to key services listed below.

With reference to the above:

• In terms of public transport, there are two bus stops located approximately 200m (3-minute walk) from the site ('Ogmore By Sea Post Office'), with the '303' providing services between Llantwit Major and Bridgend.

• The site is located 200m (3-minute walk) from the 'Ogmore By Sea Post Office' which can provide basic goods to meet day-today needs such as bread, butter, milk etc.

• The site is also located 50m (1-minute walk) from a children's park.

These services and facilities are therefore well within the best category (i.e. categorised/scored as 'green') - within 800m of site (10-minute walk). Accordingly, the site therefore has good access to services and facilities. This

Furthermore, the settlement of Ogmore By Sea has been ranked higher than Llangan (which the site 'Land to north and west of Westwinds Business Park' is located within) in the VoG Sustainable Settlements Appraisal, and therefore, is considered to constitute a more sustainable location to accommodate residential growth. Most notably, Ogmore By Sea scores '13' in respect to 'Daily Facilities' whereas Llangan only scores '3', evidencing that residents in Ogmore have much better access to services within the locality as compared to Llangan.

Given the above, 'Land at Hazelwood, Ogmore' does/should align with the aims and targets set out in the Preferred Strategy as it meets several of the key development goals set out. Its inclusion should therefore, in our view, be

considered “sound” and therefore suitable to be allocated for future developments. The site should properly and appropriately be allocated in lieu of ‘Land to north and west of Westwinds Business Park’ – the inclusion of which is “unsound”. ‘Land at Hazelwood, Ogmore’ would therefore ensure that affordable units, where “there is a need for small scale affordable housing led development (minimum 50% affordable) to respond to local affordable needs and help

sustain services and facilities within these rural communities”, are provided for. As such the proposed housing trajectory would be maintained.

Land to the East of Colwinston, Colwinston

A summary of the Candidate Sites Assessment at Preferred Strategy Stage has been extracted below:

As outlined above, the site was rejected and considered not suitable for further consideration. In fact, and unlike ‘Land at Heol Fain, Wick’ and ‘Land to north and west of Westwinds Business Park’ it was stated that this site “could not be considered as a suitable affordable housing led development site”. Despite this, this site is identified to be allocated as an Affordable Housing Led Allocation. As such, the inclusion of this site is “unsound”.

It is known that Colwinston has been subject to significant housing allocations in the settlement as part of previous plans. To evidence this, 25% of the 64 units (i.e. 16 units) were approved on the site allocation ref. MG2(41) and PP ref.

2014/00242/FUL. This makes a substantial provision of such Affordable Housing units (and housing generally) in the settlement in recent years.

Other similarly sized and comparable settlements and locations have not by contrast been subject to any growth for some considerable time, and accordingly would warrant and benefit from provision as part of this new replacement plan.

Notwithstanding the location of such provision, and as set out in detail at the outset of these representations, National Planning Policy advocates the high and acute need for affordable housing, whilst recent analysis evidences that there is a housing emergency. These circumstances - coupled with the shortcomings identified and set out earlier in these submissions in respect to the adequacy of provision within the plan (rolled forward sites / inadequate provision etc) – means that notwithstanding any potential allocation at Colwinston, further provision ought to be made in comparable (previously unprovided for) locations, such as Ogmore By Sea.

Summary of These Representations

To re-iterate, and to summarise the case made and set out, these representations seek to object to the Housing Trajectory published as part of the consultation on the Draft Housing Trajectory For Housing Stakeholder Group (October 2025) which underpins the Plan and the delivery / realisation of its underlying strategy.

Detailed submissions and objections are raised above in respect to the trajectory information published regarding the soundness and robustness of this information (and it’s consultation), which we do not consider are adequate, robust, or sound to deliver the Plans aims and objectives.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Representation Form - Redacted - https://valeofglamorgan.oc2.uk/a/3zt
Cover Letter - Redacted - https://valeofglamorgan.oc2.uk/a/3z4
Candidate Site Submission - Allocation Prospectus - https://valeofglamorgan.oc2.uk/a/3z6
Housing Trajectory Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3z8
Preferred Strategy Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zv
Candidate Site Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zc
Deposit Plan Representations - Redacted - https://valeofglamorgan.oc2.uk/a/3zw

5788 Comment

Document Element: DNP4 - HISTORIC ENVIRONMENT
Respondent: Mrs Gail kirkham [1596]

Summary:

Any development on the green wedge between Llanmaes and Llantwit Major makes a mockery of this policy. Conservation areas need appropriate protection including from inappropriate development overlooking them.

Full text:

Any development on the green wedge between Llanmaes and Llantwit Major makes a mockery of this policy. Conservation areas need appropriate protection including from inappropriate development overlooking them.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

6602 Comment

Document Element: DNP4 - HISTORIC ENVIRONMENT
Respondent: Mr David Barton [2683]

Summary:

LAs should adopt a Local List of Valued Buildings (Non-designated Heritage Assets).

Existing Action Plan if present for Designated and Non-designated Heritage Assets needs identifying and/ or establishing.

Era-style Buildings, especially rows of Georgian, Victorian and Edwardian architecture must be faithfully restored, retained and recreated to complement surrounding historic streets that may or may not be classed in official Conservation Areas preventing harsh contrast with newer built housing estates from the 1950s onwards.

Concerted efforts to identify and locate core suppliers for raw materials and specific heritage skills should encourage new uptake of these limited artisan craft skills by new contractors locally based to support the local economy, provide employment, and reduce the cost of product and service in the long-term.

Volunteer labouring assemblies should be fully encouraged and supported identifying key individual an group skillsets that can be utilised to protect historic buildings or areas at risk.

Simplified streamlined Planning Process for key stakeholders either working to authentically restore buildings and/ or build new ones.

Where there have been evolving building styles over years, eg. Combination of one or more: Georgian, Edwardian and Victorian, the style that best promotes the area, ie. One that has the majority era structures left or capacity size requirements as examples should be utilised by house builders.

Full text:

Context:
This consultation feedback submission has been produced by Mr. David Richard Barton, also known as Community Campaigner David Barton who is promoting both the existing Built Historic Environment and Traditional Vernacular Architecture (TVA)/ Traditional Architecture (TA) as a key feature across UK and Ireland-wide Local Authorities and associated Planning Departments at all tiers of Local, Regional and Central Government.
This universal consultation therefore acts as an official Representation at all and any stage of official area UK Planning Consultations- Preliminary Scoping Documents, Named Stages of the Local Plan, Conservation Area Appraisals and Supplementary Planning Documents (SPDs), primarily regarding Design Codes.
Representations are being made by Mr. Barton as part of his ongoing work to champion the key stakeholders at various key areas old and new with a view to supporting their economic growth through the merits of High-Quality style Conservation with the hope of encouraging wider constructive and restorative support through positive and constructive working.
It is submitted that TVA should play a key part in any and all policy moving forwards on the grounds of conferring practical benefits be these periodic maintenance, their perceived support from the public, their invaluable contribution to achieving Climate Crisis Targets set local, nationally and internationally alongside their overall cost-effectiveness to key stakeholders alike in terms of Planning and sourcing of raw materials.
*One primary document that should be considered with significance especially alongside my own representation is a written academic account of the actual practicalities associated with Traditional Architecture from a leading expert in their field.i.) Not only does this in-depth analysis provide an in-depth take on the widely assorted merits of this type of Architecture but it fully corroborates my case made across all sections typically found in one of the consultations highlighted above.

Furthermore, my representations to date and contained herein this document are duly supported by the Founder and Director of The Institute for Traditional Architectureii.) who has identified and recognised my own contribution(s) to communities up and down the Sefton Borough. This is an internationally acclaimed organisation which periodically works with other leading agencies and organisations to bring about effective positive change.
Outlined throughout Submission are responses to existing Consultations which set out why I consider amendments to existing Planning Policy documents are necessary to ensure the best possible outcomes.
References to supporting documents are contained in the indented blue numbering.
This Submission has been prepared for UK and Ireland-wide Local Authorities in the hope that it may serve as an umbrella representation by Mr. Barton. This does not prejudice his ability to also comment on live stages of any one Consultation, merely providing the ability to be put in touch directly with any one Local Authority in receipt of this Representation with the prospect of also taking part in any version(s) of Consultations begin ran by said Local Authorities. If there are future consultations, especially regarding Design Codes and SPDs relating to this across both designated and non-designated heritage assets then it is hoped that these are duly provided to Community Campaigner David Barton.
Mr. Barton has cited material references and sources from his previous Representation to the Bootle Area Action Plan Consultation (2021-2026) that align with his existing and ongoing points which he would like to raise in parallel with other Local Authorities. Where a more detailed discussion with leading sources, such as Architects and Academics may prove conducive with these Councils then Mr. Barton would be delighted to discuss this further.
Community Campaigner David Barton:
Community Campaigner David Barton is a Heritage Campaigner of over 11 years' experience who has championed and led a number of successful campaigns to promote TVA in modern-day life. His dual mandate is to provide effective (alternative) use of historical buildings encompassing a full restoration alongside achieving the mainstream construction of new classical architecture on numerous economic, environmental and ecological grounds that align with existing policy set out by Central Government covering the UK and increasingly elsewhere across the world.
Having worked with a wide array of residents, businesses and organisations in that time, which has included the full restoration of the Victorian Verandahs on Lord Street, Southport in tandem with the respective key stakeholders and other property owners to prevent demolition of Old Builds across Sefton, Mr. Barton is now hoping to make the process of utilising the built environment to its fullest potential a far simpler one that will enable Bootle to fully reach its maximum potential as a historic town.
SECTION 1: Design Codes:-
1. Design Codes based on TVA should be utilised in preference to Design Guides
2. LAs should establish recurring partnerships with key Consultation Bodies, such as Create Streets and The King's Foundation, etc who specialise in getting through to a huge swathe of grassroots members of the public with tried and tested previous experience in Local Plans, such as Lichfield, etc.
3. Non-demolition of historic buildings prior to the 1950s must be made policy or adhered to as part of LCC's commitment to combatting the Climate Crisis through sequestering carbon in its Old Builds.
4. LAs should adopt a Local List of Valued Buildings (Non-designated Heritage Assets), which have been a Government requirement since the policy introduction through the NPPF in 2012. Historic England produced a guide to help Councils in May 2012. Bristol produced an exemplar list in 2015, which is well worth reviewing.
5. Existing Action Plan if present for Designated and Non-designated Heritage Assets needs identifying and/ or establishing (I may support this if invited).
6. Option for people to provide feedback even if out of time for additional documents, such as SPDs or at the discretion of Councils where feedback may be particularly assistive or lead to additional academic and architect guidance. Option for public publishing of feedback should be encouraged with the consultee's consent to encourage wider consultation uptake moving forwards.
7. Era-style Buildings, especially rows of Georgian, Victorian and Edwardian architecture must be faithfully restored, retained and recreated to complement surrounding historic streets that may or may not be classed in official Conservation Areas preventing harsh contrast with newer built housing estates from the 1950s onwards.
8. Where demolition is proposed for 1950s style housing onwards- any new construction must be in the historic building style and local materials to ensure high carbon capacity, quality aesthetic and true blending of the interconnected conurbations of any one area, place or location.
9. Concerted efforts to identify and locate core suppliers for raw materials and specific heritage skills should encourage new uptake of these limited artisan craft skills by new contractors locally based to support the local economy, provide employment, and reduce the cost of product and service in the long-term.
10. Volunteer labouring assemblies should be fully encouraged and supported identifying key individual an group skillsets that can be utilised to protect historic buildings or areas at risk with a view to supporting the construction of new authentic style housing (as and where appropriate) and the reconstruction of demolished prized old buildings beloved by the community, such as community pubs, libraries and community centres.
11. Simplified streamlined Planning Process for key stakeholders either working to authentically restore buildings and/ or build new ones, such as observed with many civic buildings in Budapest Hungary and the Federal University Buildings in the US.
12. Where there have been evolving building styles over years, eg. Combination of one or more: Georgian, Edwardian and Victorian, the style that best promotes the area, ie. One that has the majority era structures left or capacity size requirements as examples should be utilised by house builders, especially where a streetscape may have been annihilated during the World Wars.
SECTION 2: Designated & Non-Designated Heritage Assets:
1. Enhancement of Historic Areas to remove modern street furniture with the integration of classical style timepieces should be encouraged and pursued wherever possible with clear preferred guides set out for each part of the City.

2. Enhancement of Setting with funding grants and financial incentives from all tiers of Government for Private Investors especially those contributing actively towards achieving Net Zero through Embodied Energy/ Carbon Capacity rich measures, i.e. Retention of Old Builds.
3. Archive Pooling of invaluable source material, such as Historic Photographs, Oil Paintings, such as “Memory Lane” featured on InYourArea Magazine to enrich existing material archives.
4. New officialising of Non-Designated Heritage Assets must be actively supported even if informed by the (wider) community thereby providing some possibility of removing these from risk of demolition.
5. Incentives must be provided to those dependable sincere third party investors that take on, maintain and protect said sites against their annihilation from the streetscape with rescue-packages actively promoted and supported once again with a trusted Directory creating goodwill amongst the local community.
6. Opportunity to meet or correspond on Zoom Conference Call regarding key areas, buildings and places at risk where key stakeholders, such as property owners may be better placed to engage in positive and constructive discussion through third parties, such as myself and a trusted panel of experts in their fields and sectors who could enable these people and organisations to maximise their civic heritage, whilst proactively striving to protect more historic buildings from decline and/ or demolition where a strategy package for raising the revenue to do this could be arranged and facilitated.
7. Defining Character Areas- zoning symmetrical parallel construction recommended where distinctive individualised properties remain as checked against authentic archive blueprints. This will ensure high-quality housing for everyone reducing the societal divides between misperceived “good areas” where affluent people reside in historical style properties and less advantaged reside in contemporary ones.
8. Industry should be conserved at former industrial complexes, such as Economic Docks with equivalent sites offering modern-day uses, alongside traditional uses such as export and import of raw materials at places such as Docks and Port encompassing: ICT sector, Green Research & Development, etc.
9. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of long-beloved buildings, especially those with demonstrable evidence of Holy Worship.
10. Every effort must be made to reach out to Property Owners, especially Housebuilders that are pursuing demolition of landmark buildings, especially those with key links to an area’s founding or history locally.
11. All Powers to monitor, collaborate with existing and/ or new property owners to conserve these buildings should become mandatory with appointed Community Champions for Civic Heritage that area direct link between Local Authorities and said wider key stakeholders to prevent demolition of structures that may be at risk of destruction from vandalism, urban exploration and demolition.
12. Reconstruction Programme harnessing existing limited crafts people’s skillsets to be used as a fundraising vehicle to bring back buildings that may have been demolished to dissuade future demolition as a choice by property owners and by means of expanding these otherwise lost skillsets that are at live risk of becoming extinct from the UK.
13. Checklist of buildings at high risk must be expanded beyond the existing groups and organisations that are saturated with high caseloads, such as SAVE Britain’s Heritage, etc so that dialogue channels can be created and fostered between Community Champions for Civic Heritage.
14. Bespoke-tailored funding packages for Properties at Risk of decline or demolition should be integrated with Local, Regional and Central Government-funding as a means of regional economic output through the return on investment that may support other key grant funding capital infrastructure projects, such as transportation and drainage improvements.
SECTION 3: Conservation Areas:-
1. Alterations for Listed Building Consent must be simplified with additional streamlined testing methodologies, such as proof of legitimate third party support, such as correspondence chains between applicant and Groups, such as The Victorian Society that can assist LAs complete workload much sooner allowing more attention for challenging cases, such as Non-Designated Heritage Assets at live or upcoming risk of demolition by Housebuilders, etc.
2. Highways & Street Furniture should be duly supported across the whole of an area to enhance its historic appeal to the commercial community as much to its indigenous community; as this is supported greatly in equivalent Public Realm Strategy SPDs- where any and all guidance and support must and should be provided, with key at risk projects being an exceptional anecdote that may be cited in future documents or versions of this and other consultations to stimulate economic construction and restoration across other designated Conservation Areas, etc or otherwise.
3. Provide incentives for the return of lost adornments and decorative features, such as roof fixtures like Chimney Stacks once again with an approved contractor directory to make Old Builds practical to own, live and work in the 2020s onwards. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.
4. Permissions for authentic replica and more durable materials, such as reproduction sash windows must be supported to prevent exorbitant high costs through procuring these, limited longevity and economic climates being unstable. This must be assessed on a case by case basis.
5. No more deliberate manipulation and selective misinterpretation of using contemporary modern designs using old-style fabric raw materials, such as stone cladding for new housing where the design and shape clearly undermine the concept of blending within or around a Conservation Area.
6. Compendium of approved and recognised TVA Architects based across the UK with a view to supporting the training in time of more Northern counterparts to reduce cost associated with travel expenses, etc. This will actively reduce the level of demolition applications countering the purpose of this SPD and other live Policy. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of decorative features must be provided by the Local Council.
7. New Conservation Areas should be established covering areas of surviving built historic environment to positively reverse fascia changes to more modern ones.
8. Blue Plaques should be fully supported across as many different Conurbations, especially if Applicants reach out for

endorsements.
9. Discretionary Rate Relief should be provided to those proactively support LAs with conserving their respective Conservation Areas through their own resources, skillsets and time as an incentive to others to work alongside the Council positively and constructively.
10. Where long-lost prized buildings are reconstructed whether based in a Conservation Area or not this should confer discretionary financial support, e.g. Rate Relief for the length of time taken to produce this outcome acknowledging the embodied carbon now contributing positively towards the LA's Climate Change Action Plan Targets.
11. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with collaborate fundraising models utilised from key stakeholders, such as property owners, undisclosed third party investors, Residents' Groups, etc.
12. Retention of historic street furniture, such as Lamp Posts adorning high streets or Promenade style streetscapes with authentic identical reproductions permitted where all options to secure finance have been fully exhausted and/or the existing streetscape is at imminent risk of receiving contemporary replacement street furniture on health and safety grounds, eg. Lap Posts.
SECTION 4: Climate Change:-
1. Pleased to note that LAs broadly acknowledge and grasp this concept therefore the aim should be to increase the net number of carbon-rich Old Builds long-term through support packages that will combat the Climate Crisis, provide economic benefit and improve Conservation in a pioneering fashion that may draw wider funding opportunities for the area.
2. Retrofit Ventilation is a key point that should warrant future new construction utilising higher ceilings through the reconstruction of Old Builds outfitted for the modern day with retrofitted energy supplies, etc that will also serve to break down societal dives regarding perceived good and bad areas where streetscapes are harmonious yet distinctly unique in beauty like any one Conservation Area.
3. Embodied energy and embodied carbon- must remain a central priority and so influence new construction to readopt TVA principles as this will be pivotal towards the area's future green credentials as outlined in many existing auxiliary planning documents approved presently with Carbon Studies taken of existing architecture, notably buildings saved from demolition.
4. A brick by brick case study of as many buildings as possible may warrant invitation of national and international academic institutions to undertake a regional or national Carbon Study further justifying the retention of prized Old Builds elsewhere across the area, region and the UK.
5. Sustainable Materials- an approved contractor directory that could readily advise and source the necessary raw materials with realistically reduced costs substantially again deterring potential demolition-driven applicants from consuming workload time of the Planning Department. If a Directory cannot be provided then specific wording and guides on esoteric restoration and new traditional building styles that would see modern-day use of sustainable materials must be provided by the Local Council.
6. Biodiversity- maximise greenery along all arterial roads ad commuter routes with dense tree planting and the introduction of hedgerows and wherever possible financial incentives to get more private property owners on side.
7. Flooding Defences- existing and prospective hotspot areas should be clearly identified for emergency grant funding whereby Local Authorities, especially across a region may agree with the respective Government Department to distribute emergency flooding to prevent costly consequential recurrent repairs.
8. Transportation using arterial roads and commuter routes (Motorways and Railways) should prioritise linking each end of a Local Government sphere with the surrounding Local Government spheres, such as Southport at the very northern tip of Merseyside where transportation links are much weaker with Lancashire in the north and east than with the rest of Merseyside to the south.
9. Coastlines should be reclassified as SSSIs, especially where the economic potential is not being fully realised, such as Coastal Towns with underused Beaches, such as Southport in Sefton as one example for other LAs.
10. Financial Incentives for the demolition of Carbon-poor Glass Towers and contemporary construction should be utilised to restore the skylines across any one area whilst providing better mathematical application of the space for residential and commercial use, such as larger tenement buildings or the original streetscape reinstated yet designated specifically for housing where there may be a deficit.
SECTION 5: Historic Buildings:-
1. Create a Designated AND a Non-Designated Heritage Asset List, such as AHV whereby existing buildings and those that may yet return can be logged and recorded to combat the Climate Crisis whilst making heritage work for LAs in modern day with attractive locations timeless for everyone to appreciate enhancing the investor appeal, all-round interest and acknowledging the industrial pioneering legacy of the City.
2. Clearance of vegetation along the Railway Lines alongside other equivalent parts of the Line to eradicate the perceived neglected aesthetic.
3. Exception Areas, such as those at risk or recently restored have the real potential for wider grant funding for ambitious projects out of the realm necessarily of undisclosed third party investors supporting Property Owners, therefore all and any support in reaching these person(s) will greatly contribute to all possible tangible success in the interim period.
4. Providing key guidance, such as agreed in-keeping historic street furniture, such as Cast Iron Lamp Posts, Bins, Planters approved upon inspection of historic photographs, agreed installation and where appropriate maintenance by the LA will ensure the iterative success of this transferring to other Conservation Areas, etc.
5. Scheme to rebuild and reconstruct long-lost buildings, prioritising vacant sites that could adapt some mixed use with residential accommodation and commercial application thereby supporting Climate Action, creating employment and recordable success through placing of necessary economic drivers, such as offices for Technology Sector if original use cannot be sourced in sufficient time simultaneously meeting housing targets.
6. Archive Blueprints for historic conurbations that have suffered architecturally over time through building conversions,

demolitions, etc should be provided to key stakeholders, if necessary with a printing charge available for official spiral hard copy version to view detailed historic plans covering layouts, etc.
7. Those people and organisations that have either/ both maintained their properties well over the years or may wish to provide additional support to others, such as restorative support, archive blueprint guidance, etc should be eligible for discretionary reductions by the Council across various property taxes where they may be suffering hardship or through personal circumstances.
8. “Newer” style housing with true authentic rhythm, such as Suburban style faux Tudor fascia frontages with red clay tile pitched roofs and terracotta design windows (tile hung walls) are a good compromise whereupon finance and scheduling may otherwise adversely impact on housing settlements.
9. Fascia Frontage details should be reinstated whether in a Conservation Area or not, especially where approval has been granted to rebuild an entire house using breeze block to produce a stereotypical black, white and grey dwelling out of place.
10. LAs should work closely with Foundries to procure raw materials and building services in the event of harnessing their own Contractor Firm(s) in-house that could work cross-authority to make net savings whilst ensuring particular new housing neighbourhoods conform to an appropriate style.
11. Modern “Carbuncle” extensions should not be permitted at any one area- instead an authentic style addition may be used to retain blending.
12. Discretionary financial support packages to assist House Builders choosing the traditional vernacular route should be considered and utilised where it can be proven that this third party will restore the historic streetscape yet making it applicable or modern day requirements- residential or commercial. This may be especially so where they are able to help others prevent the demolition of a prized Old Build built before the 1950s.
SECTION 6: Traditional Vernacular Architecture:-
1. Provide a directory of approved and trusted Conservation Specialist Contractors- this will be key for repairs and maintenance reducing costs for all parties, expediting the physical process of regeneration and smoothen planning work schedules so that finer detail may be considered on priority cases or those that may be at risk of consequential repair, such as Places of Worship and detached Buildings with flat roofs, etc at higher risk of damage than customary dwellings.
2. These same people should be readily contactable for new construction
3. Encourage smart building methods and use of TVA as meticulously explained in this SPD outlining “Breathing” Solid Wall Construction using older style materials thereby reducing maintenance cost which combined with the approved contractor directory will further drive down costs, time and effort for everyone.
4. Alterations- must introduce a simplified listed building consent form and application process that is streamlined encouraging better maintenance of Old Builds and reducing the rising propensity of builders to allow buildings to deteriorate, such as the Historic Pub that had to be rebuilt in Kilburn, London post 2015.
5. Provide specialist Heritage Arts & Craft Skills Programmes that anyone can learn and use so that these high cost tasks can eventually stabilise in price making them more affordable and available to those that don’t have the time to do this themselves or may be risk averse even.
6. Extensions- there must be a proactive emphasis on in-keeping structural fabric to prevent future errors, such as the Municipal Building depicted in the SPD being replicated again thereby harming the Conservation value.
7. New Housing Estates should adopt historical archival blueprints, ie. A Georgian, Victorian or Edwardian layout with the likeliest period architecture utilised where this area remained greenbelt until the 1950s.
8. Area Expansion of housing must revert to traditional timeless designs that confer many practical advantages over modern styles that are harder to maintain are timeless with regard to dating and ensure a more evenly distributed community atmosphere in the long-term future.
9. Infrastructure should be appropriately considered for existing and new areas so that no one area is at risk of becoming congested through traffic for a particular commodity, such as Schools, Doctor Practice, Dental Practice, etc.
10. Site Layouts should complement the historic layout with a view to Post 1950s contemporary Architecture out of place being one day demolished to reinstate Long-lost beloved buildings from before the World Wars that could blossom economically today.
11. Building Form shouldn’t permit for dated modern structures that delineate and essentially divide communities between the old and new parts of any one location.
12. Façade Design mustn’t be compromised for contemporary architecture, especially in view of coveted Heritage Status for any one area being at risk of being lost if said contemporary architecture is pursued.
SECTION 7: Making an application:-
1. Identify recurring applicants that are harming civic heritage, be this across Conservation Areas, Non-designated heritage assets or elsewhere with experience of demolition to date- this should be considered before granting permission to apply or acquire planning approval.
2. Enforcement Penalties for key stakeholders that purposely allow their properties to fall into decline and hoped eventual demolition through this tactic, which is more prevalent since 2020.
3. Create an Action Plan to deter persons or organisations from pursuing demolition, such as financial incentives, sincere investor network directory set by Central Government to offload for profit and enforced Design Codes that cannot be manipulated through semantics like Design Guides in isolation as has happened elsewhere. This must be kept for emergency instances where there is an expected threat of decline or demolition.
4. Agreed that temporary alteration of heritage sites, such as stairs or ramps for wheelchairs should be utilised to prevent deleterious loss of historic surroundings and features alike.
5. Full Pre-Consultation publicised and utilised to ensure appropriate Design Codes for new housing alongside positioning and layout in case volunteer assemblies may assist property owners with restoration of historic buildings.
6. Brick by brick Analysis undertaken of projects set for Traditional reconstruction so that these statistics may provide

both the Council with evidence for green grant funding support for other key infrastructure projects, such as Transportation and
Drainage Defences and property owners may incur a discretionary reduction in associated reconstruction costs of heritage buildings and vistas.
7. Ability to lock feedback in for Consultation automatically unless the council can alert interested consultees in taking part again whether they are locally, regionally or nationally based.
8. Special partnerships with Property Owners of historic buildings at risk of decline/ demolition to discreetly support them with the option to publicise this accordingly to reach out to others in the same position to secure alternative use for these structures as opposed to demolition.
9. Proactive effort to stop Breaking and Entering style of “Urban Explorers” who are coincidentally apparent whenever demolition is scheduled for buildings especially since 2020.
10. LAs to proactively work closely alongside Community Champions and other leading Heritage Groups, such as English Heritage giving these organisations a voice on the frontlines, especially where so many buildings are presently being overlooked for additional guidance and/ or support due to cost and time restraints facing these same groups and organisations (including the LA).
SECTION 8: MISCELLAENOUS:-
1. Provide all possible support for the reconstruction of Old Builds as is happening elsewhere across Europe, especially Budapest, Hungary, North America, etc to significantly increase Embodied Energy/ Carbon storage.
2. Establish a Plan to adopt Unadopted Roads or supply key services, such as carriageway resurfacing as disabled access and entry/ exit of Emergency Vehicles is presently a cause for concern.
3. Provide Pre-Approval and agreement of specialist Conservation Area style Historic Street Furniture, such as Cast Iron Lamp Posts, Bins and Planters for this prime Conservation Area including installation, maintenance costs (where appropriate).
4. Provide full access to the Archive Resources (at no/minimal cost) as an invaluable incentive for existing and parallel undisclosed third Party Investors. Discretionary waivers may be appropriate for those third parties proactively working to prevent decline and demolition of historic buildings.
5. Car Parking on and off street should be supported to ensure freedom of choice for everyone, accessibility and connectedness.
6. Car Parking abodes should be tastefully designed like modern-day stables for vehicles that are in-keeping with the built historic environment.
7. Provide publicly published names of consultees willing to work alongside the Local authority and other key stakeholders, such as property owners and undisclosed third party investors, etc.
8. Provide select tours for prospective investors and housebuilders of existing traditional architecture where Design Codes of this identical style would complement both old and new architecture bending the area better more cohesively, eg. the form and layout of Oxford City Centre which has changed minimally structurally since the 1800s.
9. Provide a focused effort on utilising people’s skillsets on a meritocratic basis, ie. Procure specialists and volunteers that could work together on key emergency projects, such as Historic buildings at risk without layered bureaucracy on achieving positive outcomes, such as Community Assets where deadlines can be thwarted by separate third parties.
10. Create a Top Ten Historic Buildings at Risk Register where appropriate conditions, such as security against Urban Exploration, etc can be utilised safeguarding these structures, providing the respective property owners peace of mind whilst actual scope for revitalising these for solid economic gain.
11. Infrastructure assessments should be fully outlined, such as Air Quality risk from new construction at presently congested areas, hence the case for Traditional Architecture that will confer longevity benefits in the long-term with as much free car parking as possible.
12. Free Car Parking may be monitored through expected proof of purchase when visiting, eg. minimal £1.00 at a shop encouraging partnerships between private businesses and LAs.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation - https://valeofglamorgan.oc2.uk/a/33d

5761 Support

Document Element: DNP5 – ENVIRONMENTAL PROTECTION

Respondent: Mining Remediation Authority (Mrs Melanie Lindsley, Principal Planning & Development Manager) [3359]

Summary:

Although our records indicate that there is very limited coal mining legacy in the Vale of Glamorgan area we are still pleased to see that land stability is included as a criterion for Policy DNP5 when new development is proposed.

Full text:

Although our records indicate that there is very limited coal mining legacy in the Vale of Glamorgan area we are still pleased to see that land stability is included as a criterion for Policy DNP5 when new development is proposed.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

5789 Support

Document Element: DNP5 – ENVIRONMENTAL PROTECTION

Respondent: Mrs Gail kirkham [1596]

Summary:

Absolutely necessary in the case of Llanmaes and the disputed Lidl development.

Full text:

Absolutely necessary in the case of Llanmaes and the disputed Lidl development.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6150 Comment

Document Element: DNP5 – ENVIRONMENTAL PROTECTION

Respondent: Mrs Jacky Williams [3343]

Summary:

In Rhoose, the current infrastructure is insufficient for the current population. Any increase in housing provision must include a complete overhaul and upgrading of the sewage system before additional housing. In this day and age it is unacceptable to have sewage leaking into the ground drainage – as I understand happened recently when the road under the bridge at Fontygary flooded.
As I identified elsewhere, the additional housing at Readers Way, Rhoose would increase the risk of more instances of flooding where run off from the land already causes problems.

Full text:

In Rhoose, the current infrastructure is insufficient for the current population. Any increase in housing provision must include a complete overhaul and upgrading of the sewage system before additional housing. In this day and age it is unacceptable to have sewage leaking into the ground drainage – as I understand happened recently when the road under the bridge at Fontygary flooded.
As I identified elsewhere, the additional housing at Readers Way, Rhoose would increase the risk of more instances of flooding where run off from the land already causes problems.

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6232 Comment

Document Element: DNP5 – ENVIRONMENTAL PROTECTION
Respondent: Mrs Jan Arnold [3499]

Summary:

The flood alleviation scheme for Llanmaes has been mentioned sevral times in the RDLP but there are no specific details. Given the flooding that has taken place recently this scheme should be expedited with full details provided.

Full text:

The flood alleviation scheme for Llanmaes has been mentioned sevral times in the RDLP but there are no specific details. Given the flooding that has taken place recently this scheme should be expedited with full details provided.

Change suggested by respondent:

-

Sound: Not specified
Attachments: None

6374 Object

Document Element: DNP5 – ENVIRONMENTAL PROTECTION
Respondent: Mr Hayden Pocock [3561]

Summary:

Flood Alleviation

A flood alleviation scheme for Llanmaes has been in place and, indeed, ground works were started but then abandoned following the Covid19 pandemic. The village drainage system combines sewage and rain water run off and is overwhelmed every winter after a period of wet weather. This year a number of homes suffered sewage overflows and raw sewage flooding on the Llanmaes recreation field is an annual event. In the case of the latter, the only place for the sewage to drain is into the brook and be carried via Boverton until it reaches Llantwit beach. Welsh Water have carried out various works over the last few years, including the deployment of pumps for weeks at a time, but the underlying problem is not really addressed.
Llanmaes needs the flood alleviation scheme to be re-instated.

Full text:

Flood Alleviation

A flood alleviation scheme for Llanmaes has been in place and, indeed, ground works were started but then abandoned following the Covid19 pandemic. The village drainage system combines sewage and rain water run off and is overwhelmed every winter after a period of wet weather. This year a number of homes suffered sewage overflows and raw sewage flooding on the Llanmaes recreation field is an annual event. In the case of the latter, the only place for the sewage to drain is into the brook and be carried via Boverton until it reaches Llantwit beach. Welsh Water have carried out various works over the last few years, including the deployment of pumps for weeks at a time, but the underlying problem is not really addressed.
Llanmaes needs the flood alleviation scheme to be re-instated.

Change suggested by respondent:

Llanmaes Flood Alleviation Scheme, should be included in the RLDP.

Sound: Not specified
Attachments: None

6379 Object

Document Element: DNP5 – ENVIRONMENTAL PROTECTION

Respondent: Mrs Jaqueline Hughes [3563]

Summary:

Flood Alleviation
Llanmaes residents should still not have to rely on floodgates as their only means of defence in the face of heavy rainfall. The much discussed but never fully implemented Flood Alleviation Scheme, should be included in the RLDP. In addition, if the ill conceived retail development at Bridge Farm is rejected, this land, plus the Green Wedge, could be used for ecologically sustainable tree planting.

Full text:

Flood Alleviation
Llanmaes residents should still not have to rely on floodgates as their only means of defence in the face of heavy rainfall. The much discussed but never fully implemented Flood Alleviation Scheme, should be included in the RLDP. In addition, if the ill conceived retail development at Bridge Farm is rejected, this land, plus the Green Wedge, could be used for ecologically sustainable tree planting.

Change suggested by respondent:

Llanmaes Flood Alleviation Scheme, should be included in the RLDP.

Sound: Not specified

Attachments:

Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3ns

6390 Comment

Document Element: DNP5 – ENVIRONMENTAL PROTECTION

Respondent: Llanmaes Community Council (Mrs C Alexander, Clerk) [240]

Summary:

4. Flood Alleviation – proposals for Flood Alleviation for Llanmaes Village
The need for a flood alleviation scheme for Llanmaes is acknowledged on several occasions in the Deposit Plan but unfortunately there are no specific proposals therein. The Community Council would firstly like to record our appreciation of the continued acknowledgement of the need for a Flood Alleviation Scheme for Llanmaes and would urge the Vale of Glamorgan Council to redouble its efforts with the Welsh Government to revive this, currently shelved, project.

Full text:

4. Flood Alleviation – proposals for Flood Alleviation for Llanmaes Village
The need for a flood alleviation scheme for Llanmaes is acknowledged on several occasions in the Deposit Plan but unfortunately there are no specific proposals therein. The Community Council would firstly like to record our appreciation of the continued acknowledgement of the need for a Flood Alleviation Scheme for Llanmaes and would urge the Vale of Glamorgan Council to redouble its efforts with the Welsh Government to revive this, currently shelved, project.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4st

6411 Comment

Document Element: DNP5 – ENVIRONMENTAL PROTECTION
Respondent: Mr David Harris [2291]

Summary:

4. Flood alleviation
Flood alleviation for Llanmaes is acknowledged in the plan but no action is proposed. This has been ongoing for over 20 years resulting in a number of houses suffering from flooding resulting in a physical and emotional impact on the community. This matter need to be urgently actioned.

Full text:

4. Flood alleviation
Flood alleviation for Llanmaes is acknowledged in the plan but no action is proposed. This has been ongoing for over 20 years resulting in a number of houses suffering from flooding resulting in a physical and emotional impact on the community. This matter need to be urgently actioned.

Change suggested by respondent:

-

Sound: Not specified
Attachments:
Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/3qh

6538 Comment

Document Element: DNP5 – ENVIRONMENTAL PROTECTION
Respondent: Mr & Mrs Alison and Richard Leach [2143]

Summary:

Finally I want to talk about the flood alleviation scheme, we are affected by this as part of the project is over our land in Siginstone lane. The RLDP mentions several times but no response has been forth coming. The village floods and for many many years The council and the Welsh government have put in funding in 2023, the Welsh government allocated £3,090,855 and in 24/25 £16,000 to solve this. Nothing has yet happened, indeed in the RLDP it is mentioned extensively that the village floods but we cannot see what specific directions have been made to resolve this problem. I urge the Vale council to liaise with the Welsh government about bringing this forward and mention in the deposit plan.

Full text:

Finally I want to talk about the flood alleviation scheme, we are affected by this as part of the project is over our land in Siginstone lane. The RLDP mentions several times but no response has been forth coming. The village floods and for many many years The council and the Welsh government have put in funding in 2023, the Welsh government allocated £3,090,855 and in 24/25 £16,000 to solve this. Nothing has yet happened, indeed in the RLDP it is mentioned extensively that the village floods but we cannot see what specific directions have been made to resolve this problem. I urge the Vale council to liaise with the Welsh government about bringing this forward and mention in the deposit plan.

Change suggested by respondent:

-

Sound: Not specified
Attachments:
Email Representation Redacted - https://valeofglamorgan.oc2.uk/a/4rs

6849 Comment

Document Element: DNP5 – ENVIRONMENTAL PROTECTION
Respondent: Taylor Wimpey [386]
Agent: Savills

Summary:

Taylor Wimpey consider the inclusion of 'the loss of the best and most versatile agricultural land' to be at odds with the other elements listed, where unlike the others mentioned, the loss of agricultural land would have limited, if any, impact on people, residential amenity and property.

It is acknowledged that the loss of BMV agricultural land may impact the VoG's overall amount of high quality agricultural land, however this should be assessed against the existing high level of BMV agricultural land within the County. The extent to which its loss is considered "unacceptable" should be subject to the planning balance against the overriding need for affordable housing and local housing need. Consideration towards the farming business case and economic viability are also required within the planning balance. In the case of Land West of Swanbridge Road, the loss of BMV agricultural land remains the only constraint that cannot be overcome, as noted in the Candidate Site Assessment. Whilst the loss of high quality agricultural land should be avoided, Taylor Wimpey consider that where the merits of the Site are overwhelmingly in favour for sustainable residential development in a suitable and logical location, Policy DNP5 should not stand in the way of housing delivery.

Whilst Taylor Wimpey support the clause within the draft policy: "Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the impact identified to an acceptable level. Planning conditions may be imposed, or legal obligation entered into, to secure any necessary mitigation and monitoring processes." However, in the context of BMV agricultural land, it is not clear how the mitigating measures, in the form of planning conditions or legal obligations, can be applied. This reinforces the earlier view that the inclusion of 'the loss of the best and most versatile agricultural land', as currently worded within the draft policy, is at odds with the other elements listed where mitigation strategies for pollution can be suitably conditioned.

Full text:

1. Introduction

1.1.1 Savills is instructed by Taylor Wimpey PLC ('Taylor Wimpey') to respond to the consultation on the Deposit Plan as part of the preparation of the Replacement Local Development Plan ('RLDP') by the Vale of Glamorgan Council ('VoG').

1.1.2 The submission is made in the context of Taylor Wimpey's position as the promoter of Site ID 376 (Land West of Swanbridge Road, Phase 3). The site is being promoted for a residential development comprising of 260 homes.

1.1.3 Taylor Wimpey is one of the UK's leading national housebuilders, with extensive experience in delivering high-quality residential developments across a wide range of local authority areas. The company has an established presence within the VoG area. Taylor Wimpey is in the process of delivering Phase 1 of the site with development of Phase 2 close to commencing to dovetail with the completion of Phase 1. Phase 3 would act as a logical extension to the site, effectively rounding off development in this part of Sully and dovetailing with Phase 2 which is anticipated to be completed in 2029.

1.1.4 The site was originally submitted as a candidate site as part of the Call for Candidate Sites stage in September 2022 by Taylor Wimpey. This was a comprehensive site submission demonstrating that the site was viable, deliverable and sustainable – the three tests for Candidate Sites to satisfy as set out in Paragraph 3.36 of the Development Plans Manual. The Candidate Site submission consisted of the following information:

• Archaeological Desk-based Assessment (prepared by RPS);
• Design Vision (prepared by Pegasus Group);
• Drainage Strategy & Flood Risk Assessment (prepared by Pheonix Design);
• Landscape Appraisal (prepared by Pegasus Group);
• Preliminary Ecological Appraisal (prepared by Soltys Brewster);
• High Level Viability Statement (prepared by Savills);
• Transport Technical Note (prepared by Vectos); and
• Supporting Statement (prepared by Savills).

1.1.5 Since then, and on behalf of Taylor Wimpey , Savills have also responded to the consultation on the Preferred Strategy in February 2024 as well as the Housing Growth in Barry consultation in July 2025 and the Housing Trajectory in October 2025.

1.1.6 This supporting statement is structured to initially comment on the approach taken by the VoG in assessing the Land West of Swanbridge Road, Phase 3 site before commenting on specific policies that are contained within the Deposit RLDP.

1.1.7 In general, Taylor Wimpey's position is that, at present, the Deposit RLDP is not sound but that it could be made sound through the amendments as suggested throughout this Statement.

2. Candidate Site Assessment Process and Integrated Sustainability Assessment
Introduction

2.1.1 Candidate sites are in essence assessed through two means – the Candidate Site Assessment Background Papers and the Integrated Sustainability Appraisal.

2.1.2 Taylor Wimpey's position is that both of these documents do not provide an adequate assessment of the Land West of Swanbridge Road, Phase 3 site.

2.1.3 Each is considered in turn below.

Candidate Site Assessment Process

2.1.4 All candidate sites have been assessed at Preferred Strategy stage (reported as Background Paper 18) and Deposit stage (reported as Background Paper 18a).

2.1.5 The reason for the Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site not being carried forward as part of these assessments was presented in Background Paper 18 at the time of publication of the Preferred Strategy with Backgropund Paper 18a providing no further site analysis. The reason for the site not progressing this stage of the Candidate Site assessment process is as follows:

"Development of the site would lead to a loss of the Best and Most Versatile Grade 3a agricultural land contrary to national policy."

2.1.6 Whilst parts of the site do constitute Best and Most Versatile (BMV) land, Taylor Wimpey's position is that there are compelling reasons relating to the site's context and how it is utilised that mean a more nuanced position needs to be taken. Without such nuance, the RLDP risks not allocating a site that, whilst perhaps containing BMV, is otherwise suitable for development and more suitable for development then sites that the Deposit RLDP proposes to instead allocate.

2.1.7 Included at Appendix A, and included as part of Taylor Wimpey's representations on the Preferred Strategy and the Housing Growth in Barry consultations, is an Agricultural Assessment prepared by The Andersons Centre.

2.1.8 The key conclusions from this Assessment are that:

• The site is farmed by a tenant farmer whose main base is approximately 12km away which presents logistical and practical challenges. These challenges are exacerbated by the lack of farm buildings and the fact that there is no mains electricity;

• The site forms part of a wider 230 acre farm and so the cessation of agricultural practices on this parcel will not, by virtue of its size, prejudice the continued farming of the wider land parcel;

• The tenant farmer farms approximately 3,000 acres of land and so the loss of the ability to farm this parcel will have a negligible impact on the continuation of their agricultural operations;

• The site is bound on two sides by existing or permitted housing, on a third boundary by a railway line, and on its eastern boundary by a road; and

• Farming of the land does not support a high level of employment and if the land was lost for development, 0.15 of a full time labour unit's equivalent work would be lost.

2.1.9 Taking the above together, the conclusion needs to be reached that the site's size and context presents challenges for farming and that the development of Phase 2 by Taylor Wimpey has the potential to exacerbate these challenges. Aligned to this, the level of employment that the farming of the site supports is negligible and the cessation of farming of this particular parcel of land will not materially impact either the continued farming operations of the wider farm that the land sits apart of or the tenant farmer that farms the land.

Integrated Sustainability Appraisal

2.1.10 The Initial Integrated Sustainability Appraisal undertaken at Preferred Strategy stage provides a GIS based appraisal of all sites against 17 objectives. Inherently the Initial Integrated Sustainability Appraisal can be a bit of a blunt tool but Taylor Wimpey's position is that the site performs better against a substantial number of the 17 objectives than the current assessment.

2.1.11 Included at Appendix B is an assessment undertaken by Taylor Wimpey which provides commentary against certain objectives and suggests why the site performs considerably better than forecast in the Initial Integrated Sustainability Appraisal.

2.1.12 A summary of this is presented below:
Table 1 Summary of ISA and Suggested Taylor Wimpey Approach

2.1.13 Taylor Wimpey's position here is clear – the inadequacy of the Integrated Sustainability Appraisal as a tool for assessing candidate sites can only be appropriate where the Integrated Sustainability Appraisal is done correctly and

considers the mitigation measures that a candidate site submission proposed to put in place. Without this, the Integrated Sustainability Appraisal risks a situation – as Taylor Wimpey suggest has been the case in Policy HG1 KS1 – where a Key Site is selected in favour of alternative sites that are better performing.

3. Deposit Plan

3.1 Introduction

3.1.1 The following section of this Statement comments on the relevant Key Themes, Strategic Objectives and draft Policy Framework forming part of the Deposit Plan Consultation.

3.1.2 The Policy Framework has been reviewed with comments provided on only those policies considered to be of most relevance to Land West of Swanbridge Road (Phase 3), Sully. The position on individual policies contained within the Deposit RLDP are summarised in the table below:

Table 2 Taylor Wimpey Policy Position

Relevant Policy Support or Object
SP1 Sustainable Growth Strategy - Object
SP2 Settlement Hierarchy - Support
SP 6 Housing Requirement - Object
HG1 Housing Allocations: HG1 KS1 – Land at North West Barry - Object
TR1 Transport Proposals: TR1(2) Active Travel Route Sully to Cosmeston - Support
TR1 Transport Proposals: TR1(6) Highway Improvement Works Weycock Cross Roundabout - Object
CC1 Residential Operational Net Zero Carbon Development - Object
CI1 Open Space Provision - Clarity required
DNP5 Environmental Protection - Object as currently worded

3.2 Key Themes and Strategic Objectives

Homes For All

3.2.1 As noted in paragraphs 3.17 and 3.18 of the Deposit Plan the VoG has the highest affordability ratio in Wales with average house prices 9.7 times the average workplace earnings compared to the Welsh average, giving rise to a significant need for affordable homes which is under significant pressure. This highlights the ever increasing need for sufficient high quality housing, which Taylor Wimpey are committed to provide and supply the mix, type and tenure of housing needed within the local authority's growing population.

Placemaking

3.2.2 Taylor Wimpey embed strong placemaking standards across their developments as detailed within their Placemaking Charter. Taylor Wimpey consider Land West of Swanbridge Road (Phase 3) to present an opportunity to provide a comprehensive residential development that is accessible and well-connected with the existing settlement of Sully and compliments the earlier phases of development. As demonstrated in the earlier phases of development, the Site offers a sustainable location for future growth with easy access to a range of services and facilities in Sully.

Protecting and Enhancing the Natural Environment

3.2.3 Taylor Wimpey support the VoG's commitment to protect and enhance the natural environment through the integration of green/blue infrastructure network and the sustainable management of resources within the VoG. However where Objective 5 seeks to safeguard land from inappropriate development, proposals must be subject to the relevant planning balance giving weight to the surrounding land use and appropriateness of safeguarding agricultural land that would otherwise be unconstrained and considered suitable for development given the outstanding need for housing.

Promoting Active and Sustainable Travel Choices

3.2.4 Taylor Wimpey support the promotion of sustainable travel and active modes of transport, including the provision of designated active travel routes that improve the connectivity between primary and key settlements, such as the Sully to Cosmeston active travel route.

3.2.5 As demonstrated in the earlier phases of Land West of Swanbridge Road, Taylor Wimpey support the promotion of active travel within new developments and provide opportunities for residents to easily engage with active travel.

3.3 Policy Framework

Policy SP1 Sustainable Growth Strategy

3.3.1 Taylor Wimpey's comments on this policy relate to the sustainable growth strategy in so much as it relates to the

spatial strategy rather than the housing requirement that the RLDP adopts with further comments on the housing requirement provided in connection to Policy SP6 (Housing Requirement).

3.3.2 Taylor Wimpey appreciate the need to balance the ten strategic objectives against the need for growth and protection of the VoG's natural and built environment, and strongly support the strategic objective to provide homes for all. Taylor Wimpey maintain their position on the proposed growth strategy that has been established within earlier consultation responses submitted throughout the RLDP process, including the most recent consultation on 'Growth Options in Barry'.

3.3.3 Taylor Wimpey consider that to date the growth strategy has placed disproportionate emphasis on identifying an alternative site within Barry, rather than giving due consideration to potential sites in nearby high-performing settlements such as Sully. Taylor Wimpey therefore strongly encourage the VoG to widen the search for additional allocations beyond the administrative boundary of Barry Town Council and to consider locations that represent a logical and sustainable extension to neighbouring primary settlements that are located within the Strategic Growth Area, including Sully.

3.3.4 The six key elements of the Sustainable Growth Strategy are noted and Taylor Wimpey support a spatial strategy that locates major new development for the delivery of sustainable housing growth in appropriate locations, such as Sully, that are supported by the relevant infrastructure, services and facilities. Providing new homes within Phase 3 aligns with the Strategic Growth Area identified within the RLDP Strategy which forms the primary focus for housing growth.

3.3.5 Policy SPG1 continues to identify Sully as a location where new housing development will be concentrated, therefore establishing a principle of development for Phase 3 and help to further align the provision of new housing with the existing facilities of Sully, reducing the need to travel. Sully represents an inherently sustainable location for future growth and aligns well with the Sustainable Transport Oriented Growth Option. As identified in the Deposit RLDP, Sully is classified as a Primary Settlement and performs a complementary role to Barry as a key centre. Its position within the Strategic Growth Area further indicates that an appropriate level of development at Sully would be acceptable, with both existing housing delivery and the current allocation at Swanbridge Road supporting its established role.
3.3.6 With existing development ongoing to the north of the Site, at Phases 1 and 2 of Land West of Swanbridge Road, Phase 3 is considered to provide an appropriate level of growth in a sustainable location that would form a logical extension to existing allocations. The sustainability and suitability of Sully to accommodate residential development is reinforced by the allocation of 500 dwellings under Policy MG2(37) ('Land West of Swanbridge Road, Sully') on land directly north of the site promoted by Taylor Wimpey. The progression of this location into a phase 3 development would continue to strengthen Sully's function as a primary settlement and would constitute a logical and coherent extension to the existing built form.

Figure 1 Extract of Growth Strategy

3.3.7 Taylor Wimpey appreciate the aspirations of the Council to deliver housing to meet the identified future housing needs of the VoG and wider growth aspirations of the South East Wales Region at a strategic level. Taylor Wimpey support the revised strategy moving away from North East Barry, however maintain the position that this level of growth should be re-allocated to those locations that are most suitable for growth, including sustainable settlements outside of Barry. Growth should not be focuses solely on Barry.

Policy SP2 Settlement Hierarchy

3.3.8 Taylor Wimpey support the conclusions of the Settlement Appraisal Review Background Paper which identifies Sully as a Primary Settlement, reflecting its important role in providing a level of housing growth, in addition to key local services and facilities. Within this Background Paper, Sully is recognised for its vital role as a sustainable community, scoring highly across all key principles in demonstrating its sustainability by providing for the day-to-day needs of its residents. Taylor Wimpey concur with the supporting evidence which reinforces Sully's importance within the settlement hierarchy.

3.3.9 Whilst Draft Policy SP2 presents a 'broad distribution of development within the Strategic Growth Area..', serious concerns continue to be raised around the level of growth around Barry and the emphasis placed on it as the focus for future development. Taylor Wimpey do not dispute the identification of Barry as a Key Settlement, given its position as the largest town within the VoG, however believe Barry should not remain the sole focus for growth where there are opportunities available around primary settlements located within the Strategic Growth Area.

3.3.10 Put another way, it seems perverse for the Deposit RLDP to direct no new growth to a Primary Settlement within the identified Strategic Growth Area.

Policy SP 6 Housing Requirement

3.3.11 The purpose of this policy is to set the housing requirement and then identify the components of supply that are anticipated to meet this housing requirement. A number of Background Papers (nos. BP7, BP8, BP8A, ad BP9A) underpin the approach that is taken. Taylor Wimpey have a number of comments to make on the approach taken in this policy.

Housing Requirement

3.3.12 The approach taken in the Deposit RLDP, as with the Preferred Strategy beforehand, is for the housing requirement to make use of a 10 year dwelling-led scenario, an approach that reflects past completions and looks to extrapolate this forward over the lifetime of the RLDP.

3.3.13 Taylor Wimpey provided detailed commentary on the proposed housing requirement in their comments on the Preferred Strategy but note that Welsh Government have subsequently provided their comments on the Preferred Strategy raising no objection with the housing requirement proposed to be taken.

3.3.14 Taylor Wimpey's position though remains – if a dwelling-led scenario is to be used to determine the housing requirement then it needs to have a far shorter scenario length then 10 years as the first three years of the 10 year period selected were when supply was suppressed as a result of the current LDP not having been adopted.

3.3.15 That said, there is a clear contextual change since the Preferred Strategy was adopted, this being the publication of the 2022-based household projections have been published. Table 5 of Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections provides a comparison of the 2022-based projections with the 2018-based projections and the Deposit RLDP's housing requirement. A simplified version of this table is shown overleaf:

Table 3 RLDP Housing Requirement
Scenario Housing Requirement
RLDP 7,587
2018-based projections 6,214
2022-based projections 9,623

3.3.16 This is important as Paragraph 4.2.6 of PWW states that:

'The latest Welsh Government local authority level Household Projections for Wales, alongside the latest Local Housing Market Assessment (LHMA) and the Well-being plan for a plan area, will form a fundamental part of the evidence base for development plans.'

3.3.17 The proposed approach of continuing to use the 10 year dwelling-led scenario, as a methodology, clearly does not do this.

3.3.18 The approach of using the 2022-based household projections would comply with the aspirations of PPW. Taylor Wimpey's position is that the commentary provided in the Background Paper 8A Supplementary Demographic Evidence – 2022-based WG Projections for not using 2022-based projections is wholly inadequate and that these projections should be used.

Flexibility Allowance

3.3.19 Paragraph 5.58 of Edition 3 the Development Plans Manual (March 2020) makes it clear that there is a requirement for a flexibility allowance to be added on top of the housing requirement to derive the number of homes the RLDP should plan for. This is in the interest of ensuring that sufficient housing is delivered in the event of some allocated sites either not delivering in their entirety or delivering less homes than anticipated. Paragraph 5.59 of the Manual clarifies that the extent of the flexibility allowance should be informed by local issues with 10% as a starting point (i.e. as the minimum).

3.3.20 The Adopted Local Development Plan (ALDP) applies a 10% flexibility allowance on top of the housing requirement for 9,460 homes so that provision is made for 10,408 homes.

3.3.21 Paragraph 1.2.34 of the Annual Monitoring Report 2024-2025 provides a comparison of the number of homes that have been completed and the level of completions that the ALDP anticipates. This shows that 6,999 homes have been delivered up to 1st April 2025 against a cumulative dwelling target of 8,829 homes, representing a shortfall of 20.7%.

3.3.22 Taylor Wimpey's point here is that the ALDP's flexibility allowance of 10% is insufficient to ensure that the ALDP's housing requirement is actually being delivered. This is clear evidence that a higher flexibility allowance should be used for the RLDP. Although for different reasons, but following a direction from the Welsh Government Planning Inspector, Bridgend County Borough Council has increased its flexibility allowance to 20% and, it is considered that such a buffer is appropriate for the VoG's RLDP.

Non-Delivery Allowance on Land Bank

3.3.23 Line C of Table 2 of the Preferred Strategy relates to those sites that either benefit from planning permission or are subject to a resolution to grant planning permission subject to planning permission. Combined, these sites are identified as having capacity for 1,860 homes.

3.3.24 The current approach, which assumes that all other sites which are under construction or sites where there is

either a planning permission in place or sites where there is a resolution to grant planning permission subject to the signing of a Section 106 agreement will be completed in full, causes concern for Taylor Wimpey.

3.3.25 There are multiple reasons why homes that benefit from either planning permission or a resolution to grant planning may not be delivered. These relate to viability, but also to specific site constraints and landowner intentions.

3.3.26 A point that is separate, but inherently linked, to the above is that often the capacity of a site for which reserved matters approval is sought is less than that permitted at outline stage. Requirements for SAB approval and the demonstration of a biodiversity net benefit, for example, reduce the capacity of a site at detailed design stage but are often not factored in at outline stage, particularly where the outline application is not progressed by a housebuilder.

3.3.27 Research undertaken by the Local Government Association for England (no such data is available for Wales) suggests that, between 2010/2011 and 2019/2020 a total of 2,782,300 dwelling were granted planning permission whilst there were only 1,627,730 completions. This means that during this period just 58.5% of those homes which were granted planning permission were completed.

3.3.28 Taylor Wimpey is not suggesting that applying a discount of 41.5% is necessarily correct and the above is both from England and a few years out of date but the need for a discount that relates specifically to Line C is very clear.

3.3.29 It's difficult to know what this figure should be but Taylor Wimpey suggest that a 20% figure is used to reflect the flexibility allowance.

Windfall Allowances

3.3.30 The approach taken in the Deposit RLDP is to assume that 1,303 homes will be delivered across Windfall Sites. This has been calculated on the basis of previous completion delivered as windfalls.

3.3.31 Taylor Wimpey's concern is that the delivery of homes on Windfall Sites inherently becomes more challenging over time as the easier to develop sites have been delivered and the buildings and land that hasn't been developed is subject to increasing levels of policy protection. The approach taken by Cardiff Council in their Deposit RLDP is to assume that 75% of the 10 year average Windfall Sites will be delivered and such an approach seems entirely appropriate in this case.

3.3.32 An Urban Capacity Study (October 2023) prepared by the VoG, seeks to corroborate this by identifying 2,627 homes that could be delivered across the VoG. Whilst the windfall allowances would be less than the suggested urban capacity, this shouldn't be seen as problematic or as a conflict as the purpose of the Urban Capacity Study is, as the name suggests, just to identify sites which may have capacity. It doesn't account for land ownership (and whether the land owners have aspirations to dispose of the site) or development viability. In addition, the approach taken to site capacity to is to assume a density based on site type but it does this without an appreciation of site constraints and is based on the gross rather than net area.

Rolled Forward Sites

3.3.33 Taylor Wimpey have concerns with the approach that is taken in Table 2 of the Deposit RLDP which identifies allocations for 959 homes that are to be rolled over from the ALDP to the RLDP.

3.3.34 Concerns are raised around two sites in particular - Land to the west of Pencoedtre Lane, Barry and Land between new Northern Access Road and Eglwys Brewis Road, These sites are allocated in the ALDP but have failed to be delivered. Given the longstanding period during which there has been clear policy support for development but no completions, it follows that there are serious concerns around the deliverability of these two sites which, together, are allocated for 370 homes.

3.3.35 The failure to deliver these dwellings is due to a number of factors which are detailed in Taylor Wimpey's Preferred Strategy consultation response, which questions whether these sites will deliver at all or at a significantly reduced capacity due to the following reasons:

- Viability constraints;
- Site specific constraints;
- Landowner intentions;
- Requirements for SAB approval; and
- Biodiversity net benefit;

3.3.36 Whilst it is recognised that there may be policy support for the delivery of these two sites, there deliverability is clearly uncertain and they should be removed from Table 2.

Conclusion

3.3.37 The following table summarises the approach previously proposed in the Deposit RLDP and compares it to the

amendments suggested by Taylor Wimpey in the preceding sections of this Statement.

Table 4 Deposit RLDP Housing Supply and Taylor Wimpey's Suggested Approach
Housing Supply - Deposit Plan (December 2025) - Taylor Wimpey Suggested Approach (March 2026)
Housing Requirement - 7,890 - 9,623
Flexibility Allowance - 10% - 20%
Flexibility Allowance – 770 - 1,925
Housing Requirement + Flexibility Allowance - 8,660 - 11,548
A – Completions - 1,747 - 1,747
B – Units Under Construction - 313 - 313
C and D- Units with Planning Permission Minus Non-Delivery Allowance - 1,777 1,488
Existing Supply - 3,827 - 3,548
E – Large Windfall Sites - 720 - 540
F – Small Windfall Sites - 583 - 438
E+ F Total Windfall Allowance - 1,303 - 978
RLDP Allocations - 3,520 - 3,150

3.3.38 The conclusion reached in Taylor Wimpey's analysis is that, as a result of both the suggested housing requirement and flexibility allowance combined with Taylor Wimpey's comments on the components of supply, the Deposit RLDP needs to find allocations to deliver a further 3,872 homes.

Policy HG1 KS1 – Land at North West Barry
3.3.39 Policy HG1 (Housing Allocations) identifies those sites that are to be allocated to meet the housing requirement of 7,890 homes that is set out in Policy SP1 (Sustainable Growth Strategy) and Policy SP6 (Housing Requirement) of the RLDP. Taylor Wimpey has provided comments on the housing requirement that is set in the RLDP and the components of supply that are anticipated to meet it in the proceeding sections of this Statement.

3.3.40 As well as the existing landbank and an allowance for windfalls, Policy HG1 notes that this requirement will be met through a mix of Key Sites, conventional housing allocations, housing-led regeneration opportunities, and rural affordable housing led sites.

3.3.41 There is a standalone separate policy for each of the five Key Sites that are identified in Policy HG1 (Housing Allocations). Each separate Key Site policy identifies what the site is proposed to be allocated for before providing setting out expectations of how each Key Site should come forward – both in terms of land uses that should be delivered and constraints and opportunities needing to be responded to – that are framed under a series of sub-headings. A masterplan sits alongside each Key Site policy whilst a package of supporting documentation for each Key Site submitted by the site promoter is also made available as part of the consultation on the Deposit RLDP.

3.3.42 Policy HG1 KS1 proposes to allocate the site known as 'Land at North West Barry'.

3.3.43 The proposed allocation of this site follows a consultation – entitled 'Housing Growth in Barry' - undertaken by the VoG in July 2025 which proposed to allocate three sites in Barry as an alternative to the North East Barry site that was identified as a Key Site in the Preferred Strategy but was considered to no longer be deliverable.

3.3.44 Taylor Wimpey responded as part of the 'Housing Growth in Barry' consultation, supporting the removal of North East Barry as a Key Site but raising serious concerns with the proposed allocation of 'Land at North West Barry' as an alternative.
3.3.45 These concerns remain and Taylor Wimpey strongly consider there need to be other alternative sites – such as Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) - within nearby settlements that perform better than the Land at North West Barry site and should be allocated for housing.
3.3.46 To support this conclusion, Taylor Wimpey has undertaken a review of the Integrated Sustainability Appraisal (ISA) which provides a scoring of different candidate sites against the 17 objectives as well as considering and comparing the sustainability and accessibility of the two sites.

Integrated Sustainability Appraisal

3.3.47 The below table provides a comparison of how the Integrated Sustainability Appraisal scores Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) compared to the Land at North West Barry site. Two different comparisons are provided – one which compares the actual scoring in the ISA and a second which compares the two sites following Taylor Wimpey's suggested scoring which is included as Appendix A.

3.3.48 These tables clearly highlight where the subject site out performs North West Barry across numerous objectives.

Table 5 Comparison of Phase 3 Land West of Swanbridge Road (Site ID 376) and North West Barry (Site ID 490) ISA performance

3.3.49 From an initial review, the Integrated Sustainability Appraisal shows that Land West of Swanbridge significantly outperforms North West Barry in terms of the number of significantly positive scores '++' and the number of '—' scores.

To this end the subject site provides clear advantages above and beyond North West Barry in terms of homes, health, and transport. As such Land West of Swanbridge is considered to have the capacity to deliver a significant number of new homes (≥ 100 dwellings) and it does not intersect with a designated green wedge; The site is within 800m of a health service and an active travel route; and, The site is within close proximity (≤800m) to a railway station or bus stop, town/ retail centre and an active travel route. Taylor Wimpey consider this assessment should go further to recognise the associated benefits to the leisure than be provided by the site's development.

3.3.50 Following Taylor Wimpey's re-assessment of the site against the Integrated Sustainability Appraisal ISA objectives it is also considered to obtain notably more positive '+' scores than North West Barry. It is also worth noting that North West Barry has more unknown impacts than Land West of Swanbridge which introduces a level of uncertainty around its potential for further negative impacts. Moreover, North West Barry scores a significant number of negative impacts across the ISA, with the extension site obtaining double the amount than Land West of Swanbridge Road.

3.3.51 Taylor Wimpey's position is that it would be unsound to allocate a site that performs considerably poorer in the Integrated Sustainability Appraisal than a site that is not proposed to be allocated.

Accessibility and Sustainability

3.3.52 SLR Consulting have prepared an updated document demonstrating the Site's sustainability credentials and providing a detailed overview of existing and future active travel and public transport infrastructure. This is included as Appendix C.

3.3.53 As a starting point, it considers those services within Sully. In terms of local amenities, the population size of Sully, naturally benefits from a good range of local amenities and services, and therefore it is anticipated that a high proportion of future residents' day-to-day journeys would be contained within the village and undertaken via walking or cycling. The Walking Catchment Map prepared by SLR demonstrates this and illustrates services within walking distance from the Site.

3.3.54 The proposed development benefits from local existing and future / planned infrastructure which will help support travel by sustainable modes such as walking, cycling and public transport. The Site falls within the less than 15 minutes Public Transport Catchment for bus and rail services. The Site is supported by the existing bus network, connecting Sully with Barry, Penarth and Cardiff – the nearest bus stop approximately 400m from the centre of the site; Moreover the Site is within proximity to Cadoxton and Penarth railway stations which have regular services in each direction in addition to the existing walking and cycling infrastructure in and around Sully.

3.3.55 The future accessibility of the Site will be further enhanced through the ongoing and planned South Wales Metro improvements, future active travel routes and the proposed Sully to Penarth mixed use link. The below figure shows several newly proposed active travel routes running close to the site including a new walking / cycling route along Swanbridge Road. Planning applications are now being submitted to support the delivery of these new active travel links. In March 2025 a planning application was submitted proposing a new route between Palmerstown and Dinas Powys.

3.4 SLR have undertaken further assessment work comparing the sustainability credentials of Land West of Swanbridge Road to Land North West of Barry. Land North West of Barry, is separated from the existing built-up area by the B4266 Pontypridd Road where the eastern and southern boundaries abut residential properties. As such, the proposed access for all modes would be taken from the A4226 Port Road West. The A4226 and B4266 can be a barrier to the promotion of active travel in that they facilitate vehicular travel and do not provide an attractive environment for pedestrians.

3.5 Furthermore, Land North West of Barry is on the fringes of Barry and had few if any facilities within a 10 minute walk, other than bus stops. In comparison, Land West of Swanbridge Road in Sully benefits from its proximity to the High Street in Sully and the services there.

3.6 The below table demonstrates differences in accessibility to amenities between the two sites, where Land West of Swanbridge Road presents a more favourable location for future development.

Table 6 Comparison of Local Facilities Between Land North West of Barry (Site ID 449) and Land West of Swanbridge Road (Phase 3) (Site ID 376)

3.7 Whilst the walking distance shown from Land North West of Barry to the nearest bus stop is slightly less than the Swanbridge Road Site, it should be noted that the bus services that can be accessed from Sully are more frequent and more direct than those which can be accessed from Land North West of Barry.

Conclusion

3.8 Taking the above together, the conclusion Taylor Wimepy reach is that their Land West of Swanbridge Road (Phase 3), Sully (Ref. 376) site performs more strongly than the Land North West of Barry site.

Policy TR1 Transport Proposals

3.9 The draft transport proposals contained within the Deposit RLDP have been reviewed with the following proposals considered to be pertinent to the Site and draft residential allocations.

TR 1 (2) Active Travel Route: Sully to Cosmeston

3.10 Taylor Wimpey support the designation of an active travel route connection the eastern side of Sully with Cosmeston in the north-east. Most notably the proposed route will pass Swanbridge Road which provides direct access to Land West of Swanbridge Road Site, with Phase 3 in close proximity to the travel route. The proposal would further enhance the accessibility and sustainability of the Site as a logical extension for residential development in Sully.

Figure 4 Extract of Deposit RLDP Proposals Map with Land West of Swanbridge Road (Phase 3) Identified

TR1 (6) Highway Improvement works: Weycock Cross Roundabout, Barry

3.11 Taylor Wimpey raise concerns around the proposed works at the Wyecock Cross Roundabout, compared to the other improvement works proposed. As noted in the Deposit RLDP, this roundabout forms a key connection within the wider strategic highway network and therefore of high importance for the local area and surrounding communities. The proposed options presented within the Deposit RLDP provide little certainty of the scope of works required with no preferred option identified. This raises concerns around the impacts of the highway improvements on the deliverability of the adjacent draft allocation of North West Barry. The same concerns arise when considering the roundabout improvement works in combination with the proposed access strategy contained within North West Barry's supporting information package. The proposed road widening measures (c.11m increase) required to make the draft allocation accessible would have a significant impact on the wider transport network at this strategic junction.

Policy CC1 (Residential Operational Net Zero Carbon Development)

3.12 The effect of this policy is to require new build development to achieve net-zero operational emissions. This is to be achieved through the following of the Energy Hierarchy for Planning with Policy CC1 (Residential Operational Net Zero Carbon Development) then setting out space heating and energy use intensity standards to be met from RLDP adoption through to 2030 and then from 2030 onwards, and setting a requirement for on-site renewable electricity generation to have an output equivalent to annual energy consumption. The policy notes that this may not be technically feasible and, in these cases, requires that development maximises onsite renewable generation and / or connects or proposes to connect to a heat network and / or contributes to offsetting.

3.13 As a starting point, Taylor Wimpey share the concerns expressed by the wider development industry that setting requirements above and beyond building regulations (the 2025 Future homes Standard) is not appropriate. Building regulations are there as a mechanism to set fixed requirements that any development must achieve and the effect of introducing requirements to go beyond this results to an uneven framework for housebuilders, significantly adding cost and reducing certainty.

3.14 The justification for exceeding building regulations is set out in Section 7 of Background Paper 33A Net Zero Buildings and throughout Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment and centres on the fact that there is a precedent for such policies in both adopted and emerging policies.

3.15 There are two points to be made here:

3.16 Firstly, a Written Ministerial Statement by then Housing and Planning Minister Lee Rowley made clear that it was not for Local Plans to set local energy efficiency standards that go beyond the requirements of building regulations with Inspectors to take this position at Local Plan examination stage. This Written Ministerial Statement was subject to a judicial review which was dismissed with the position taken in it found to be legally sound.

3.17 Clearly this is the position of the Westminster Government rather than the Welsh Government but the point is that it is wrong to suggest that there is a clear approach emerging in England for Local Plans to incorporate such policies when the Written Ministerial Statement warns Local Plans against setting energy efficiency targets that are stricter than building regulations.

3.18 Turning to a Wales context, whilst it may be the case that other local planning authorities are considering or looking into the use of such policies, it is worth noting that the two South East Wales local planning authorities which have adopted RLDPs do not include such policies and therefore that can be no confidence that the incorporation of such a policy approach will be found to be sound.

3.19 Secondly, Taylor Wimpey have concerns with the approach that has been taken with regards to viability.

3.20 From Taylor Wimpey's review, a figure for achieving the requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is based on an analysis of three separate house type typologies as presented in Figure 4 of Background Paper 33A Net Zero Buildings. Background Paper 33A Net Zero Buildings is dated November 2025 but Background Paper 33 Net Zero Buildings Feasibility Study and Cost Assessment is from January 2024.

3.21 As a starting point, the figures for achieving this upgrade have been used by Hallam in the undertaking of the Development Viability Model with the development of the site found to continue to be viable with these incorporated.

3.22 Taylor Wimpey's concern is around the robustness of an approach that considers only three building typologies and does not carry out the exercise for a far broader range of house types that are deployed by all of the active housebuilders (both market and affordable) across Wales. Savills' experience is that in reality the cost associated with delivering these standards is in reality far higher and closer to the £15,000 or £20,000 per unit mark.

3.23 Taylor Wimpey's other concern with this approach is that the figure assumed as being required to achieve the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) is driven from a Cost Assessment report published in January 2024. With the Background Paper 9A Housing Land Supply and Housing Trajectory not forecasting first completion onsite until 2028/2029, there is likely to be a period of approximately five years from the establishment of the figure for delivering the policy requirements of Policy CC1 (Residential Operational Net Zero Carbon Development) and when the first units would be delivered onsite.

3.24 Taking the above together, not only is the approach proposed to be taken in Policy CC1 (Residential Operational Net Zero Carbon Development) out of line with the approach that is to be taken in England and the approach that has been taken in Wales, it is considered that there is insufficient certainty around the ability for these works to be delivered when they are required to be without harming viability.

Policy CI1 (Open Space Provision)

3.25 This policy consists of four parts which, combined, dictate how open space should be provided. These parts of the policy set expectations for the level of public open space that should be provided for, confirm that provisions for open space should also be made for commercial uses, notes that it is expected that open space will be provided onsite, and requires that an open space strategy is submitted as part of applications where open space is required to be provided.

3.26 Taylor Wimpey note that Policy CI1 (Open Space Provision) of the Deposit RLDP, when compared with Policy MD3 (Provision of Open Space) of the adopted LDP, proposes an increase in public open space provision from a total of 2.4ha / 1000 people to 2.75ha / 1000 people.

3.27 Taylor Wimpey is not clear as to what has driven the increased level of public open space that Policy CI1 (Open Space Provision) identifies as being required and would welcome clarification on this matter, Policy DNP5 Environmental Protection

3.28 Taylor Wimpey consider the inclusion of 'the loss of the best and most versatile agricultural land' to be at odds with the other elements listed, where unlike the others mentioned, the loss of agricultural land would have limited, if any, impact on people, residential amenity and property.

3.29 It is acknowledged that the loss of BMV agricultural land may impact the VoG's overall amount of high quality agricultural land, however this should be assessed against the existing high level of BMV agricultural land within the County. The extent to which its loss is considered "unacceptable" should be subject to the planning balance against the overriding need for affordable housing and local housing need. Consideration towards the farming business case and economic viability are also required within the planning balance. In the case of Land West of Swanbridge Road, the loss of BMV agricultural land remains the only constraint that cannot be overcome, as noted in the Candidate Site Assessment. Whilst the loss of high quality agricultural land should be avoided, Taylor Wimpey consider that where the merits of the Site are overwhelmingly in favour for sustainable residential development in a suitable and logical location, Policy DNP5 should not stand in the way of housing delivery.

3.30 Whilst Taylor Wimpey support the clause within the draft policy: "Where impacts are identified the Council will require applicants to demonstrate that appropriate measures can be taken to minimise the impact identified to an acceptable level. Planning conditions may be imposed, or legal obligation entered into, to secure any necessary mitigation and monitoring processes." However, in the context of BMV agricultural land, it is not clear how the mitigating measures, in the form of planning conditions or legal obligations, can be applied. This reinforces the earlier view that the inclusion of 'the loss of the best and most versatile agricultural land', as currently worded within the draft policy, is at odds with the other elements listed where mitigation strategies for pollution can be suitably conditioned.

Change suggested by respondent:

Taylor Wimpey consider the inclusion of 'the loss of the best and most versatile agricultural land' to be at odds with the other elements listed, where unlike the others mentioned, the loss of agricultural land would have limited, if any, impact on people, residential amenity and property.

The extent to which its loss is considered "unacceptable" should be subject to the planning balance against the overriding need for affordable housing and local housing need. Whilst the loss of high quality agricultural land should be avoided, Taylor Wimpey consider that where the merits of the Site are overwhelmingly in favour for sustainable residential development in a suitable and logical location, Policy DNP5 should not stand in the way of housing delivery.

It is not clear how the mitigating measures, in the form of planning conditions or legal obligations, can be applied to loss of BMV land.

Sound: Not specified

Attachments:

Redacted Deposit Representation Form - https://valeofglamorgan.oc2.uk/a/3c8
Redacted Candidate Site Rep Form - https://valeofglamorgan.oc2.uk/a/3c9
Redacted Candidate Site Rep Form 2 - https://valeofglamorgan.oc2.uk/a/3cv
Redacted ISA HRA Representation Form - https://valeofglamorgan.oc2.uk/a/3cb
Redacted Supporting Evidence - https://valeofglamorgan.oc2.uk/a/3g5

6971 Support

Document Element: DNP5 – ENVIRONMENTAL PROTECTION

Respondent: Dwr Cymru Welsh Water : Developer Services (Mr Dewi Griffiths, Development Growth Officer) [1741]

Summary:

We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.

Full text:

Vale of Glamorgan Replacement Local Development Plan (RLDP) 2022-2037
Thank you for consulting Welsh Water on the Vale of Glamorgan Deposit LDP, we appreciate and welcome the opportunity to engage in the Local Development Plan process.
Settlement boundaries
SSC1 – development within settlement boundaries
We welcome the requirement for new development to make efficient use of land and benefit from existing infrastructure provision or, where necessary, make provision for new infrastructure without any unacceptable effect on the natural environment (10).
Housing delivery
HG1 - housing allocations
A. Key sites (Policy HG1 KS1-5)
Our representation on the above sites are included in appendix 1.
B. Housing allocations (HG1 (1) to HG1 (9))
Our representation on the above sites are included in appendix 1.
C. Major landbank sites (HG2 (1) to HG2 (5))
These sites are existing commitments and Dwr Cymru Welsh Water has made representations on the planning applications submitted for these sites.
D. Housing led redevelopment opportunity (HG3 (1))
Our representation on the above site is included in appendix 1.
E. Rural affordable housing led sites (HG4 (1) to HG4(4))
Our representations on the above sites are included in appendix 1.
Our representations on the proposed allocated sites are included in appendix 1. Where planning applications have already been submitted and are pending a decision, we have made representations during the planning application consultation process regarding the capability of our infrastructure to accommodate the proposed development. If capacity does not exist within our infrastructure to accommodate the demands arising from a development site, the planning authority can make planning permission conditional upon there being adequate infrastructure available to cater for the development. A developer has a right to connect to our sewerage networks provided that a development site benefits from planning permission and there are no overriding planning conditions attached to the permission that controls the location or timing of that physical connection.
Gypsy and traveller accommodation (GT)
SP9 - gypsy and traveller site provision
Our representation on the site allocation is included in appendix 1.
Retail, commercial and service centres (RCS)
SP12 - retail floorspace provision
Our representations on the site allocations are included in appendix 2.
Community infrastructure (CI)
SP13 - community infrastructure and planning obligations
We support the provisions within the policy that the Council will secure new and improved community infrastructure where appropriate and within a timely manner, and the specific reference to utilities infrastructure. Where existing water and sewerage infrastructure requires reinforcement to serve a development it must be provided as part of the development to mitigate any adverse impacts. In circumstances where the development generates the need for infrastructure improvements that are not programmed for delivery by infrastructure providers then it must be funded by the development. Therefore, it is important for developers to engage early with relevant infrastructure providers, including the statutory sewerage and water undertaker. We welcome that the policy states that improved infrastructure must be undertaken in a timely manner. The delivery of reinforcements to the sewerage and water networks can controlled either through planning condition or a commercial agreement between the developer and Welsh Water.
Adequate potable water supply and drainage infrastructure is key to ensuring new development sites are sustainable, viable and deliverable. Hydraulic modelling assessments (HMA) may be required to determine an adequate point of connection to the water network and/or public sewers, and developers would be strongly recommended to fund

investigations at pre-planning stage. Once commissioned and completed the HMA would identify suitable connection points and/or the necessary reinforcement works required to accommodate the development (for example upsizing sewers/water mains, additional storage tanks etc). In certain circumstances surface water removal could be an alternative option for allocations where foul sewer HMAs are being requested, and we would welcome early engagement with the site developer.
The reinforcements required to the network would be established by the HMA and costings would be provided at detailed design stage. The developer would need to fund a scheme by way of the requisition provisions of the Water Industry Act or via a legal/commercial agreement with Welsh Water.
Community facilities
CI3 – new community facilities
Our representations on the site allocations are included in appendix 2.
CI5 - cemetery and crematorium provision
Our representation on the site allocation is included in appendix 2.
Productive and enterprising places
SP14 - employment growth
Our representations on the site allocations are included in appendix 2.
We support sustainable economic development, however the LPA and potential developers should be aware that the obligations of a water and sewerage undertaker only extend to the 'domestic' supply part of an employment development (sinks, toilets, kitchen facilities etc). We are not obliged to provide potable water for use in any industrial process. Where an employment development results in higher demands of water supply and/or trade effluent discharge consent, under Section 118 of the Water Industry Act 1991, we recommend and welcome early consultation with developers. The capability of our infrastructure to service future employment allocations will be assessed when the potential demands arising from the developments are known.
EMP1 - employment regeneration opportunity areas
Our representations on the site allocations are included in appendix 2.
Climate change and transition towards net zero (CC)
SP16 - climate change mitigation and adaptation
We are supportive of this policy as the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. Incorporating water efficiency measures into developments will help minimise adverse impacts on localised and wider water supply networks including the quality of water resources.
We are also pleased that the policy includes particular emphasis on the importance of sustainable urban drainage systems (SuDS), in conjunction with Schedule 3 of the Flood and Water Management Act 2010. The tackling of surface water at source is a vital component of sustainable development and will mitigate against overloaded sewers which can ultimately lead to flooding. Disposing of surface water in a sustainable manner by ensuring that it does not communicate with the public sewerage network, including rainwater harvesting systems, protects the environment and assists in ensuring that there is sufficient capacity in the public sewerage network for foul-only flows from development sites.
SP19 – Green Infrastructure
In conjunction with SAB applications, under Schedule 3 of the Flood and Water Management Act 2010, we welcome provision within this policy to integrate green infrastructure with sustainable drainage systems.
Environmental protection
DNP5 – environmental protection
We welcome provisions within the policy to protect the natural environment from unacceptable impact from pollution of land, surface water, ground water and the air as well as flooding risks.
We hope that the above will assist you as you continue to progress the LDP. If you require any further information, then please do not hesitate to contact us on 0800 917 2652 or forward.plans@dwrcymru.com.

Appendix 1 – HG1 Housing Allocations, SP9 Gypsy & Traveller Site
Our representations on site allocations are provided in the table below. The following caveats are applicable to all sites:
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are sewers and/or water mains crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion.
• Where insufficient hydraulic capacity exists within the public sewerage network or water supply network to accommodate/serve a development site, hydraulic modelling assessments (HMA) may be required, and developers would be strongly recommended to fund investigations during pre-planning stages. The findings of the HMA will identify the extent of any reinforcement required to accommodate the development, which can be procured via the requisition provisions of the Water Industry Act 1991 (as amended). If the sewerage network system in the locality is currently at capacity, there may be an opportunity to overcome our concerns by delivering a surface water removal scheme. This approach would ensure that there is no net increase in volume of flows communicating with the public sewer network, and therefore no further detriment to the public sewer network downstream of the development.
• In some instances, off-site water mains or public sewers may be required to connect to a suitable point on the existing networks at the developers' cost. We may seek to control points of connection to the public sewerage network via appropriate planning conditions. Where assets need to be laid over private land, developers will need to comply with the requisition provisions of the Water Industry Act 1991.
• If there is limited or no capacity available at a Wastewater Treatment Works (WwTW), developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcement works.
• Where capacity is currently available in the water supply network to accommodate development, we reserve the right to

reassess our position at the time of the formal application for the provision of new water mains under Section 41 and Section 51 of the Water Industry Act (1991) to ensure there is sufficient capacity available to serve the development without causing detriment to existing customers' supply as demands upon our water systems change continually.
• Please note the below comments are subject to change as the LDP progresses and/or as planning applications are submitted.

See tables in attachment for site specific comments.

Appendix 2 - Employment sites & other uses
Capacity comments for employment allocations can only be provided once the type of development and occupier/end-user of a site is known. Once requirements are confirmed, usually through the planning application process, further assessments will be undertaken. High-level comments are provided in the table below regarding any watermains/sewers crossing the proposed allocations, and the WwTW catchment that the sites are located within.
The following provisions are applicable to all allocated employment sites:
• the obligations of a water and sewerage undertaker extend to 'domestic' supplies only. We are not obliged to provide potable water for use in any industrial process. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage hydraulic modelling assessments (HMAs) to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify any required infrastructure reinforcement works. Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).
• In accordance with the Water Industry Act 1991, Welsh Water retains rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.
• Where there is limited or no capacity at a WwTW, dependant on the scale and pace of development, developers may need to fund a Developer Impact Assessment (DIA) to identify required reinforcement works. In these instances, a commercial agreement would be required between the developer and Welsh Water to deliver the necessary reinforcements.
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.

See tables in attachments for site specific comments

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/4rz

5502 Comment

Document Element: DNP6 – QUIET AREAS

Respondent: Professor Andrew Vincent [920]

Summary:

It would be very nice to have some quiet and tranquil places in Barry, the busiest and most potentially noisy settlement in the RLDP. I wonder why only Penarth is deserving of such places? Puzzling

Full text:

It would be very nice to have some quiet and tranquil places in Barry, the busiest and most potentially noisy settlement in the RLDP. I wonder why only Penarth is deserving of such places? Puzzling

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6946 Comment

Document Element: DNP6 – QUIET AREAS

Respondent: Penarth Town Council (Mr Pete Newton, Principal Policy, Innovation and Development Officer) [1125]

Summary:

Members noted that the Quiet Area provision under DNP6 only applies to Penarth and wished to know why this was the case.

Full text:

Penarth Town Council Deposit RLDP Consultation Response

Comments collated at a meeting of the Council's Consultation Task and Finish Group on 9th February 2026

Some Members attended the RLDP consultation drop-in session in Penarth and in general found it to be very informative.

Members support the general development strategy but did note the lack of information concerning discussions with adjacent and other nearby Principal Councils in the CJC Region. In view of the forthcoming Strategic Development Plan, encompassing the ten authorities, members felt that some further commentary regarding this is warranted.1

It is clear that the approach taken in the Cardiff paper is still that ideally, each Council is self-contained and "consumes its own smoke," which does not show any wider strategic thinking between the ten authorities in preparation for a regional Strategic Development Plan.

Members agreed with the view that infrastructure to support new housing developments was required in order to create successful developments, although they acknowledged that logistically it was difficult to pre-empt demand for some services such as travel and health services. Members also noted that predicting developmental needs and opportunities within wider context surrounding the UK's economic, political, and social landscapes.

Members noted that there was not much focus on Penarth or identified potential future development for Penarth beyond that already underway at the location near to Cosmeston but welcomed flexibility in its approach. Members expected to be more closely involved in the decisions and planning of this, and other such developments, and provide opportunity for wider consultation where appropriate, such as pre-application consultations, as well as would expect to be included in consultations concerning sites adjacent to Llandough, Dinas Powys, and Sully given their impact upon the town.

Penarth as a town is currently developed to its boundaries, save for the development at Cosmeston. It is, therefore, more dependent than other Service Centres on windfalls of land or buildings which may arise during the currency of the Plan. In 2023, an extensive assessment of the potential of the town concluded the following:

"There is marginally less capacity in Penarth [and Llandough] than the projected figures. However, this does not mean that the projections are incorrect or unjustifiable. The reported figures have not included a significant amount of capacity on open space land, and the projected figures for conversion of existing buildings and intensifications will be surpassed if the extant consents that exist this early in the Plan period are implemented."

The degree of flexibility, however, is substantially depending on one large site. P009, Headland School, is identified as both a potentially disused building and as a site with a capacity of 111-120 units. This special school is full to capacity and used by many Council in both Wales and England.

Members did note the inclusion of Cogan Transport Interchange under section 6.196 but would have liked to see more information about its future developments as they see it as key to increasing public transport use to Barry and further to

West Wales in general.

Members wished to advise that issues with both the bridge and the platforms at Cogan have been long term, with accessibility being central to these issues. Members felt that improvements to accessibility should be a priority at this site, with planting and landscaping considered secondary to this.

Members felt it was key to consider the additional stress on Penarth from increased anticipated demand of public transport needs and emphasised the need for this to be aptly considered by bus route providers as part of development work.

Members wanted to see a strategy that actively protects the town's heritage and culture whilst still being able to provide for current and future generations.

Members welcomed the inclusion of specific climate change mitigation and adaptation measures under SP16 and section CC1-CC6, noting the considerable attention given to Net Zero transition proposal relating to public buildings and energy. Whilst the evidence presented does not include the UK Climate Change Committee Report2, Members were pleased to see that CC1-CC6 largely reflect the Committee's finds and are tailored to a transition which reflects what is presently feasible. This is providing that the necessary skills to understand and undertake carbon assessments within a policy implementation and regulation context are readily available.

Under CC2, it was noted that the presumption against demolition3 in favour of retrofit and reuse may constrain maximum transition to net zero as, whilst there is grant aid available for public buildings and social housing, the retrofit monies available for private stock is limited.

Additional considerations will also need to be made as part of the Third Carbon Budget (2026-2030), Local Area Energy Plans and the climate change ISA theme.

Members also felt similar about the inclusion and consideration of sustainable development through the specific strategy outlined in section 5 of the document and felt this linked in well with ongoing Placemaking work and its strategic approach as detailed in SP4.

Members were pleased to see mention of the diversification of high streets, although noted that Penarth was above average in terms of occupancy. They hoped that the RLDP would be able to support the town centre and support other ways it could be improved, such as a fishmonger or identifying a site for a new Cemetery.

With Penarth classified as a Service Centre, they are identified as having a defined role. However, the decline of in-person retailing means that defining role is not that evident, and Members felt there is potentially a need to move away from the traditional retail role of Town Centres in favour of "repurposing, creating multifunctional, commercial, and service centres that meet the needs of the communities they serve" in line with Future Wales Town Centre First Policy. The term 'repurposing' suggests a stronger role for the public sector in enabling these new purposes, and Members felt that Placemaking Plans could be one potential framework for this.

Members felt that potential functional support that could be provided could include:
• The appointment of a Town Centre Manager
• Using supporting interventions such as an extension or reshaping of normal services such as Neighbourhood Services.
• Using existing or emerging new powers, such as compulsory purchases.

Members wished for the RLDP to facilitate the safeguarding of essential public services, including health, policing, fire and rescue in the town, which would help to develop the defining role of a Service Centre, and felt that specific reference to these would be beneficial.

Members supported the avoidance of coalescence with adjacent settlements through the reconfirmation of Green Wedges as it allows for relevant extensions to those settlements whilst allowing them to retain their identity.

Members noted that the Quiet Area provision under DNP6 only applies to Penarth and wished to know why this was the case.

Members advised that they welcomed further opportunity for consultation, particularly in relation to developments in the neighbouring Cardiff Bay area whilst acknowledging that this is not necessarily an RLDP concern.

Footnotes

1 There is an evidence paper concerning relations with Cardiff and a Statement of Common Ground with Bridgend. However, there is only a reference in the RLDP text to discussions with other regional Councils and not the paper itself. We would be grateful if you could provide the paper as it does impact on the soundness of this Plan.

2The UK Climate Change Committee's 'Progress Report: Reducing Emissions in Wales' highlighted the following aspects of import: Skills, Vehicle Charging Networks, Improving Recycling, Energy Plans, Decarbonising Public Buildings and

Social Housing, and reducing Road transport Demand (Car-Kilometres).

3The UK Environmental Audit Committee (2022) noted that “the evidence we received consistently recommended that retrofit and reuse be prioritised over new build.”

Change suggested by respondent:

Members noted that the Quiet Area provision under DNP6 only applies to Penarth and wished to know why this was the case.

Sound: Not specified

Attachments:

Email Representation - https://valeofglamorgan.oc2.uk/a/3d5

6203 Support

Document Element: DNP7 – DARK SKIES

Respondent: Mr David Ambrose [3488]

Summary:

It is vital in relation to SP20 - BIODIVERSITY AND ECOSYSTEM RESILIENCE that proposals for external lighting (including security lighting, amenity lighting, illuminated advertisements and lighting associated with highways, car parks, sports facilities and commercial and industrial operations) will only be permitted where it has been demonstrated that the lighting proposed has no adverse impacts on biodiversity and ecological connectivity or visual and landscape character;

Full text:

It is vital in relation to SP20 - BIODIVERSITY AND ECOSYSTEM RESILIENCE that proposals for external lighting (including security lighting, amenity lighting, illuminated advertisements and lighting associated with highways, car parks, sports facilities and commercial and industrial operations) will only be permitted where it has been demonstrated that the lighting proposed has no adverse impacts on biodiversity and ecological connectivity or visual and landscape character;

Change suggested by respondent:

-

Sound: Not specified

Attachments: None

6623 Comment

Document Element: DNP7 – DARK SKIES

Respondent: South Wales Police – Secured by Design Officer (Ms Julie Odgers, Designing Out Crime Officer) [694]

Summary:

Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.

Full text:

We would like to thank you for consulting with South Wales Police in respect of the Replacement Local Development Plan 2021 to 2036.
We welcome working with The Vale of Glamorgan Council in respect of The Vale of Glamorgan Replacement Local Development Plan 2021 – 2036: Deposit Plan to ensure the future needs and community safety is addressed within the plan and supporting documents.
We would respectfully ask that our comments are taken into consideration, and included in the plan, and that we can work in partnership to develop the specific planning guidance documents mentioned below.
The replacement development plan outlines its Vision and objectives of the RLDP as follows:
'By 2036':
The Vale of Glamorgan is a healthy and inclusive place for everyone, with equitable access to services and facilities both physically and digitally. Residents are proud of where they live and have access to the homes they need. Housing growth has delivered homes which caters for all, including affordable homes and older person's housing; contributing towards diverse and cohesive communities where residents can maintain their independence.
Through placemaking, places and spaces are safe, accessible and socially inclusive. Development respects local character and sense of place is valued by residents and contributes positively towards health and wellbeing. Positive improvements have been achieved in narrowing the disparities in Integrated Sustainability Appraisal (ISA) for the Replacement Local Development Plan Prepared for: Vale of Glamorgan Council AECOM 5 the quality of life and health outcomes for residents living in the most deprived areas through improved access to employment, education, training, services, and investment in the built environment.
The Vale enjoys a network of connected, multi-functional and accessible green and blue spaces, providing a range of enhanced leisure and health benefits within and between towns, villages, and the countryside. More residents participate in active and healthy lifestyles. Investment in green infrastructure has produced a net biodiversity benefit with the creation of new habitats, enhanced connectivity and Planting providing carbon storage and contributing towards Climate Change resilience and adaptation.
Objectives:
1. Mitigating and adapting to climate change
2. Improving mental and physical health and well-being
3. Homes for all
4. Placemaking
5. Protecting and enhancing the natural environment
Policies that support the role of a Designing Out Crime Officer and Secured by Design are as follows:
Secured by Design (SBD) is the official police security initiative that works to improve the security of buildings and their immediate surroundings to provide safe places to live, work, shop, and visit.
Planning Policy Wales (PPW) states that crime and prevention and fear of crime are social considerations to which

regard must be given by local planning authorities in the preparation of development plans. They should be reflected in any supplementary planning guidance and may be material considerations in the determination of planning applications. The aim should be to produce safe environments through good design.
Technical Advice Note (TAN) 12: Design, provides advice for all those involved in the design of development on how good sustainable design can be facilitated through the planning system. TAN 12 reminds practitioners that local authorities (including National Park Authorities) are required to have due regard to crime and disorder prevention in the exercise of their functions under Section 17 of the Crime and Disorder Act 1998.
TAN 12 recognises the Secured by Design initiative as a standard that has been shown to reduce crime.
TAN 12, paragraph states that 'Local authorities are advised to consult Designing out Crime Officers on pre-applications and planning applications for those developments where there is potential to eliminate or reduce crime through the adoption of suitable measures at the design stage. This is especially important for major developments such as new housing estates, industrial estates, shopping centres, leisure complexes, schools, and car parks. It is important to consult Designing out Crime Officers at as early stage as possible – by the time a formal application is submitted, the opportunity to take account of advice may already be limited.'
Section 17 of the Crime and Disorder Act 1988 requires local authorities to consider crime and disorder implications in all their authorities and functions and do all that they reasonably can do all they can do to reduce these problems.
Violence against women and Girls:
Crime has a major impact on people's lives in the Vale of Glamorgan and impacts on the health of the public especially those who have been victims of crime and anti-social behaviour and vulnerable groups such as Women and Girls.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
In Wales, planning is devolved. Planning Policy Wales and Future Wales: The National Plan 2040 set out the Welsh Government's national planning policy, where new developments are proposed. Planning Policy Wales explains: "A clear rationale behind the design decisions made […] should be sought throughout the development process and expressed, when appropriate, in a design and access statement."
76 The guidance for design and access statements for Wales categorises five key objectives of good design (Access, Character, Community Safety, Environmental Sustainability and Movement) and explains how meeting these objectives should ensure that both design quality and inclusive access are given sufficient consideration in the planning process.
77 Design and access statements have been required in Wales for many planning applications since 2009 and have been part of legislative requirements since the Planning (Wales) Act 2015.
The Angiolini Inquiry Part 2 First Report: Prevention of sexually motivated crimes against women in public Ordered by the House of Commons to be printed on 2 December
In Wales, local authorities are under legal obligation to consider and address crime while in the process of planning: "Local authorities [in Wales] are under a legal obligation to consider the need to prevent and reduce crime and disorder in all decisions that they take. Crime prevention and fear of crime are social considerations to which regard should be given in the preparation of development plans and taking planning decisions. The aim should be to produce safe environments that do not compromise on design quality in accordance with the cohesive communities' wellbeing goal."
The Inquiry considers that there would be an opportunity to place a greater focus on preventing sexually motivated crimes against women in public spaces if this priority were reflected in planning guidance and principles.
For instance, neither the English nor the Welsh documentation contains specific reference to considering how design can help prevent violence against women in public spaces. The Inquiry saw evidence of this being discussed: "Under public spaces in the National Model Design Guide it mentioned well located, attractive public spaces. But there is no mention of violence against women and girls. There is minimal mention of crime reduction, just that amenity spaces should make people feel safe, help overcome crime, reduce the fear of crime."
The Terrorism (protection of premises)Act 2025 (Martyn's Law)
This Act became legislation on the 3rd of April 2025. This legislation is to improve protective security and preparedness across the United Kingdom for certain premises.
South Wales Police and Counter Terrorism Policing Wales would ask that where this legislation applies that early consultation takes place with the Designing out crime officers and Counter Terrorism Policing Wales.
If a premises falls within the scope of the The Terrorism (Protection of Premises) Act 2025, the development plans should be referred to South Wales Police Designing Out Crime Officers who will in turn will take advice from Counter Terrorism Policing Wales. This consultation should take place at the pre planning stage.
Standard Tier- will drive good preparedness outcomes. Locations with a maximum occupancy of greater than two hundred people will be required to have appropriate public protection procedures in place to ensure effective protective security and preparedness if an act of terrorism were to occur in their premises or immediate vicinity.
Enhanced Tier- focused on high-capacity locations in recognition of the potential consequences of a successful attack. Locations with an occupancy of eight hundred plus at any time will be required to have in place as reasonably practicable, appropriate public protection procedures and measures that can be expected to reduce the vulnerability of the premises, and the risk of physical harm being caused to individuals if an attack was to occur there or nearby.
Premises will fall within scope of The Terrorism (protection of premises)Act 2025 where "qualifying activities" take place. This will include activities such as entertainment, leisure, retail, food and drink, museums and galleries, sports

grounds, public areas of local and central Government buildings (e.g. town halls), visitor attractions, temporary events, Places of Worship, health, and education.
The legislation applies to eligible locations which are either: a building (including collections of buildings used for the same purposes, e.g. a campus); or location/event (including a temporary event) that has a defined boundary, allowing capacity to be known. Eligible locations whose maximum occupancy meets the above specified thresholds will be then drawn into the relevant tier.
Public Spaces:
It should be borne in mind that the development of public spaces which are either owned, managed or they have influence over should also include protected security and preparedness at the concept stage of the planning process.
South Wales Police recommendations:
Our recommendations are set out below in relation the objectives and specifically to preventing crime and disorder and enhancing community safety:
1. Mitigating and adapting to climate change Secured by Design Residential Guide 2025 states:
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
Secured by Design states 'The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour.
Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.'
Research documentation can be found on the SBD website at: https://www.securedbydesign.come
Recommendations:
• SP 6 - Ensure early consultation with the Designing Out Crime Officer and to achieve Secured by Design on all new developments and refurbishments.
• CC5 - Heat Networks – Advice should be sought from the Designing Out Crime officer to ensure the safe placement of heat pump devices.
• CC5 – Consultation should take place with the Designing Out Crime Officer in respect of wind or solar farms, so Secured by Design can be achieved.
• DNP7 – DARK SKIES – Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage to discuss and be able to make recommendations in relation to lighting.
Reason: To reduce the carbon footprint of development.
2. Improving mental and physical health and well-being
• PGD1 – Creating well designed and inclusive places states:
Development must demonstrate that the following:
Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance
Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards.
Secured by Design Residential Guide states:
Poorly designed and specified public realm and communal areas, such as playgrounds, roof gardens, communal gardens, community dining rooms, toddler play areas, seating facilities have the potential to generate crime, the fear of crime and anti-social behaviour.
The design and layout of play spaces will vary depending on the age requirements. The provision of inclusively designed public amenity/play spaces as an integral part of residential developments, should make a valuable contribution towards the quality of the development and the character of the neighbourhood.
Recommendations:
• PGD 1 - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings.
• SP 5 - South Wales Police would recommend that all new public space is designed to Secured by Design standards (Residential) Guide. Use the 'Safer Parks' document (research by 'Make Space for Girls') to design safe communal spaces. Designing Out Crime officers should be consulted at pre planning stage to give their recommendations for communal space.
Reason: To enhance community safety and prevent antisocial behaviour.
3. Homes for all
Policy 7- Delivering Affordable Homes
The Vale of Glamorgan Housing Strategy 2021-2026
The strategy includes a long-term vision for housing in the Vale where "All residents in the Vale of Glamorgan have access to good quality, suitable housing and can live happily and independently in vibrant, sustainable communities."
• Aim 1: More Homes, More Choice.

• Aim 2: Improved homes and communities.
• Aim 3: Better housing advice and support.
• Aim 4: Equality of access to housing and housing services.
'The Vale has a significant need for affordable homes, with affordable housing need remaining one of the highest in Wales, even though the Vale is one of highest performing authorities in Wales in terms of affordable housing delivery. Using the principal projections, the Council's 2023 Local Housing Market Assessment (LHMA)
identifies a need for 1,075 affordable homes per annum over the 5-year period 2023-2028 and 154 affordable homes per annum for the following 10 years.'
Ensure that all new residential developments provide high quality housing that includes the right mix, tenure and type of homes that respond to the changing needs of the Vale's population. This includes homes that are affordable, accessible and adaptable for people of all ages and that address the identified accommodation needs of all the Vale's communities through all stages of life.
The Vale of Glamorgan Older Persons Housing Strategy
2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
All Welsh Government grant funded housing refurbishments must comply with the Development Quality Requirement (DQR) and achieve Secured by Design Silver award.
South Wales Police would ask that all new developments are designed and built to Secured by Design standards this includes roads, paths, lighting, defensible space and house types/ standards. We would ask that at the pre planning advice is sought from the Designing Out Crime Officer to advise on crime prevention through environmental design.
Violence Against Women and Girls:
The harm caused to victims and society by violence against women and girls (VAWG) in all its forms, including but not limited to, harassment, stalking, rape, sexual assault, murder, honour-based abuse and coercive control is incalculable. While men and boys also suffer from many of these forms of abuse, they disproportionately affect women.
In spring 2023, the Home Secretary announced Violence Against Women and Girls as a national threat and included it within the 9 Strategic Policing Requirement (SPR) alongside terrorism, serious and organised crime, and child sexual abuse.
Secured by Design can assist with ensuring that the built environment in all its forms is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise, for all. The importance of this is outlined within the National Police Chiefs' Council's (NPCC) 'Policing Violence Against Women and Girls – The National Framework for Delivery: 2024 – 2027' under the 'Prevent' element of the strategy; outlining the need for building safer spaces and places. Further information is available at:
https://www.npcc.police.uk/SysSiteAssets/media/downloads/our-work/vawg/vawg-framework-fordelivery.pdf
South Wales Police recommendations:
• SP 6 - All Welsh Government grant funded homes MUST meet Secured by Design Gold or in the case of a refurbishment Silver. Consultation with the Designing Out crime Officer should take place at the pre planning stage when an application for Secured by Design should also be made.
• SP6 - HOUSING REQUIREMENT - Where a change of use/ mixed use retail, community leisure and active travel routes are planned Secured by Design Residential and Commercial guides should be applied. Early consultation with Designing out crime officers particularly in the Town Centres is recommended.
• SP6 - HOUSING REQUIREMENT - Designing Out Crime Officers should be consulted at the concept stage of a development, where there are 10 or more housing units and in the case of commercial space 1000 square metres.
• SP6/ HG 7 - HOUSING REQUIREMENT - South Wales Police Designing Out Crime Officers to work in partnership with the Vale of Glamorgan Council Planning Department to compile a specific planning guidance in relation to Houses of multiple occupancy.
• SP6 - HOUSING REQUIREMENT- South Wales Police would ask that all flats/ apartments' conversions meet WDQR (Welsh Design Quality Standards) and achieve at least a Secured by Design silver award.
• SP6 - Housing Requirement - In the case of the change of use of residential land or properties, South Wales Police would ask that any change of use application is sent to South Wales Police Designing out crime officers.
• SP 6 - South Wales Police are involved in discussion with the Vale of Glamorgan Planning Department and the compilation of Specific planning guidance to cover co-living and similar shared facility developments.
• SP6 - HOUSING REQUIREMENT -Where co- living developments are proposed to deliver a balanced housing mix. South Wales Police would ask that the pre planning discussions take place with the Designing Out Crime officer and that the development is built to Secured by Design standards as set out in the most current Secured by Design Residential Guide.
• SP3 – DEVELOPMENT IN THE COUNTRYSIDE (Policy GT1/ SP9 – Gypsy and Traveller Site Provision). The site is reasonably accessible to essential services and facilities such as healthcare, education, employment, and public transport. Safe and appropriate vehicular access can be provided from the highway network, and the site layout affords adequate provision for parking, turning, servicing and emergency vehicle. South Wales Police would ask that they consulted to provide Secured by Design advice at the pre planning stage of any such development.
• HG6 – PROVISION OF SPECIALIST ACCOMMODATION
The accommodation is appropriately designed to meet the specific needs of the intended residents, including older people, people with disabilities, those with mental health needs, and other vulnerable groups. The development is located in an accessible and sustainable location, with good access to public transport, community facilities, health services, and local amenities –
-All specialist housing is built to Secured by Design and South Wales Police are involved at the pre planning stage of

specialist developments.
• The Vale of Glamorgan Older Persons Housing Strategy:
'To secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
HG 6 - All older person's housing to be built to Secured by Design standards and pre application consultation with Designing Out Crime Officers.
• HG7 - HOUSES IN MULTIPLE OCCUPATION (HMO's)
South Wales Police would ask that they work in partnership with The Vale of Glamorgan Planning Department, to develop a specific planning Guidance in relation to Houses of Multiple Occupancy.
• SP3 - Development in the Countryside Affordable Housing (Policy HG5) – Consultation takes place. Where, developments are planned outside the specific main areas South Wales Police would ask that they are consulted about the proposed infrastructure and design of such developments. - Early consultation is recommended with Designing Out Crime officers and South Wales Police Traffic Management.
• PGD 2 /SP 4 - 'Ensure major new development is directed to locations that are or will be by the time of initial occupation easily accessible by walking, cycling, and public transport.'- Early consultation with South Wales Police Designing Out Crime Officers and South Wales Police Road Traffic Management Department where roads and pathways are planned to be built.
• SP5 – Creating Healthy and Inclusive Places and spaces: Ensuring development proposals are designed to facilitate accessible healthy environments to address relevant determinants of health positively, particularly in response to local health needs; • Ensuring that all places and developments are as inclusive as possible, capable of adapting to a broad range of changing needs and delivering a high quality of life. – Designing Out Crime Officers are consulted at pre planning to ensure public space is designed to ensure the space is safe and inclusive for all and especially vulnerable groups. (Safer Parks Document, Angelini Enquiry).
• SP 4 - Supporting the provision of new and enhanced community and healthcare facilities: Where Health care facilities are proposed South Wales Police would ask that Secured by Design Commercial Guide /Hospitals Guide are followed and that the Designing Out Crime officer is consulted at the pre planning stage.
• SP19 – Waste management: Secured by Design guides give guidance in respect of waste management and storage. South Wales Police would ask that pre Planning advice is sought in respect of new developments and waste management.
Reason: To enhance community safety especially vulnerable groups.
4. Placemaking and Good Design
Future Wales - The National Plan 2040 (Welsh Government, February 2021)
Policy 2 - Shaping Urban Growth and Regeneration - Strategic Placemaking
The Placemaking Charter and Placemaking Plans:
Signatories to the Charter agree to promote the following principles in the planning, design and management of new and existing places:
• People and community.
• Location.
• Movement.
• Mix of uses.
• Public Realm
• Identity.
SP4 – PLACEMAKING
Development will be required to follow Placemaking principles by:
1 Ensuring high quality sustainable design that reflects local distinctiveness, character, and cultural identity.
2 Prioritising the determinants of health and well-being during the design process.
3 Creating a diverse mix of uses and multi-functional spaces.
4 Contributing to a vibrant, safe and inclusive public realm that encourages Active Travel, supports public transport use and reduces car dependency.
5 Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits.
6 Providing a range of housing types and tenure.
7 Locating development appropriately where homes, local services and facilities are accessible and well connected and integrated with existing communities.
8 Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses.
9 Protecting or enhancing the Historic Environment and its setting. Placemaking Statements will be required for all major developments setting out how the proposal accords with Placemaking Principles. In the towns of Barry, Cowbridge, Llantwit Major and Penarth Placemaking Statements should also have regard to the adopted Placemaking Plans for the area.
Designing Out Crime officers' recommendations:
• SP 4 / PGD 1/ CC 4 - Research shows that Secured by Design developments are sustainable and reduce the carbon footprint. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage It also has a significant impact on anti-social behaviour. South Wales Police ask that all new developments are built to Secured by Design standards and that they are work with The Vale of Glamorgan planning Department at the pre planning stage.
• SP 4 / PGD 1 -When designing developments road, paths and green space, South Wales Police would ask that the

developments are built to Secured by Design standards. We would ask that Designing Out Crime Officers and South Wales Police Traffic Management Department are involved in the pre planning stage.
• PGD 2 /SP 4 - It is important when designing roads and footpaths to maximise the benefits of passive surveillance, and furthermore, when addressing safety and security of street layouts, public realm, and footpaths, that Secured by Design guidance is followed, this includes landscape design, lighting, layout of buildings, etc. to ensure that all roads and footpaths (including public rights of way) are safe, secure, and accessible for all, in support of the Violence Against Women and Girls (VAWG) agenda. Where a mix development e.g. housing and retail/other use (with ten or more units) applications should be referred the designing out crime at the pre planning stage.
• SP4/ PGD1 - Contributing to a vibrant, safe and inclusive public realm - Where active travel routes are being planned, South Wales Police Traffic Management Team should be consulted throughout the planning process.
• PGD1- Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance. Secured by Design considers natural surveillance and the placing of communal spaces and provision provided. All mixed uses and multi-functional) developments should be discussed at the pre- planning stage with the Designing Out Crime Officer.
• PGD 2/ SP 4 - Developing high densities where appropriate, making the most efficient use of land and supporting mixed uses. Work in partnership with Designing out crime officers to write a 'Houses of multiple occupancy' Specific Planning Guidance.
• SP 4 - Strategically integrating Green Infrastructure networks and open space into development, delivering social, environmental and ecological benefits. Where public realm is being planned to include active travel routes, designing out crime officers and Counter Terrorism Security Advisors should be consulted if the space falls under The Terrorism (protection of premises)Act 2025 .
• SP 4 -When planning parks and community space. Public consultation should took place, and the plans referred to the designing out crime officer. (The 'Safer Parks' research by Making space for women is a document that can offer up to date advice in relation to safety/ and inclusivity).
• SP 1- When designing new schools early consultation with the South Wales Police Designing out crime officer and Traffic Management officers is prudent to ensure the safety of pupils. Achieving Secured By Design accreditation for the school will ensure that the school is planned and built with safety in mind from the outset. All schools should achieve SBD GOLD.
• HG 6 - The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age."
• The Vale of Glamorgan Older Persons Housing Strategy 2.84 The Council's Older Persons Housing Strategy 'Creating Homes and Neighbourhoods for Later Life 2022-2036' sets out a vision for the Vale of Glamorgan which seeks: 'to secure the best quality of life for older people to live as independently as possible in later life. This means delivering a range of accommodation that enables older people to live fulfilling lives and enjoy good health in attractive homes that meet their needs and allow them to retain their independence as they age." - Developments, for older residents are built to Secured by Design standards as per the Secured by Design Residential Guide.
• SP4 - Protecting or enhancing the Historic Environment and its setting: Secured by Design can be applied to historic building, contact should be made at the pre planning with the Designing Out Crime Officer.
• PGD1- Creating safe, accessible, integrated, inclusive and active environments that make efficient use of land and promote opportunities for Active Travel, and promote sustainable transport choices – Early liaison with South Wales Police and South Wales Police Traffic Management Officers so that designs can be agreed and are safe.
• SP 1 - A number of new primary and secondary schools have been developed across the Vale as part of the Sustainable Communities for Learning Programme (previously known as 21st Century Schools), with further plans as part of the programme progressing – Consultation should be sought from South Wales Police Designing Out Crime Officers and Road Traffic Management Officers at the pre planning stage planning stage with the Vale of Glamorgan Council.
• PGD 1 Incorporating sustainable design and construction solutions to maximise energy efficiency and positively contributing towards climate change resilience and adaptation. The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note 1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. - All developments are built to secured by Design to reduce the carbon footprint.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance - Facilities shall be designed to allow natural surveillance from nearby dwellings with safe and accessible routes for users to come and go. Boundaries between public and private space shall be clearly defined and open spaces must have features which prevent unauthorised vehicular access. Communal spaces as described above should not immediately abut residential buildings – Consultation with Designing Out Crime Officers and the community should take place at the pre planning stage to develop safe, inclusive spaces.
• C I3/SP13 – NEW COMMUNITY FACILITIES – Consultation should be sought from Designing out crime officers where schools/ colleges are proposed and they should meet Secured by Design Gold.
• Town Centre First SP11 - The town centre of Holton Road in Barry and the District Centre of High Street had higher than average vacant units. There is a need to ensure that future policies allow for flexibility for a greater range of uses that would be acceptable within a town centre, in line with the town centre first principle and the need to create vibrant places. South Wales Police would ask that they are consulted and are able to give advice where policies are developed

for town centres. We would also ask that Designing Out Crime Officers are consulted at the pre planning stage.
• PGD1/SP 11 - Making a positive contribution to the character of the area, responding to the local context and character through building forms and scale; materials and features, mix of uses, landscape, density, and connectivity of streets and spaces to create and/or enhance locally distinctive design and character - Designing out crime officers should be consulted at pre planning stage to ensure safe spaces.
• PGD1/SP11/SP13 - Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development: South Wales Police Traffic Management Department to be consulted by the Vale of Glamorgan Highways Department in respect of road layout/active travel routes at the pre planning stage.
• PGD1- Ensuring that public open space, private amenity space and cycle and car parking in accordance with the Council's standards – Where Public open space is being designed, the duty from The Terrorism (protection of premises)Act 2025 should be applied where a premises meets the standard as above. South Wales Police Designing out crime officer should be consulted at the pre planning stage to advice.
• SSC 1/ PG 1 - Car parks are designed and built to 'Park Mark' standards as per Secured by Design Non – Residential (Commercial)Guide.
• PGD1/CC1/ SP19 – Creating well designed and inclusive facilities - 'Providing high quality multi-functional green open spaces which can provide a choice and range of activities, including play, that also deliver enhanced biodiversity and flood mitigation and are designed to be resilient to climate change and adaptable overtime.': Consultation with the community should be sought from the outset. Parks and green spaces must be designed with safety being the key driver especially for vulnerable groups such as women and girls (Safer Parks document). Designing Out Crime Officers should be consulted at the pre planning stage to achieve this.
• PGD1 Ensuring no unacceptable impacts on public and residential amenity, particularly regarding privacy, overbearing, security, noise and disturbance.
(As above)
• PGD1: Demonstrating that traffic movements to and from the development can be accommodated, resolved, or mitigated to an acceptable degree, and where car parking is provided, this must be sensitivity integrated into the development so that it does not dominate the layout of the development – South Wales Police Designing out crime officers and Traffic Management Officers to be consulted on the layout of developments at pre planning stage.
• TR1/SP 10: Future plans for the continued regeneration of the Waterfront include the redevelopment of the Mole for apartments, a linear park and water sports centre – South Wales Police would ask that Designing Out Crime and Road Safety Management Officers are involved where redevelopment is to take place, consultation should be sought at the pre planning stage.
• RC52 – Edge of town centre retailing: South Wales Police would ask that the Designing out crime and traffic management officers are contacted in respect of new developments and the travel routes to them.
• EMP2 - MOD St Athan - New development within or adjoining MOD St Athan that is demonstrated to be required for operational defence and security purposes, and helps enhance or sustain their operational capability, will be supported in principle. – Advice should be sought from Counter Terrorism Wales and Designing Out Crime officers where redevelopment of/ adjacent to MOD St Athan is planned.
• SP15 – Sustainable Tourism: Promoting opportunities for visitors to engage in forms of tourism that have a low impact on the environment; 2 Protecting and enhancing existing tourism attractions and leisure facilities; 3 Enhancing the visitor economy, attracting local investment, providing local employment opportunities and contributing to rural diversification; 4 Recognising and protecting the Vale's distinct local identity, built and natural environment as assets to tourism; Providing a variety of tourism opportunities, particularly through all year round facilities and a range of appropriately located visitor accommodation; and 6 Encouraging tourism visits to be made by active and sustainable transport modes – Designing Out Crime Officers advice and advice in respect of Crowded Places to be sought at the pre planning state of any event.
• CI4 – Protecting and enhancing existing community facilities: Proposals for new community facilities or proposals which seek to retain, enhance or maintain existing community facilities will be supported. This includes the provision of multi-use community facilities, including the colocation of healthcare, schools, libraries and leisure facilities – South Wales Police would ask that all new community facilities plans are referred to the Designing Out Crime Officer and Counter Terrorism Wales for early consultation.
Reason: To ensure all public realm is safe, espcially for vulnable groups such as women and girls.
5. Protecting and enhancing the natural environment
Ecological Networks and Green Infrastructure
Project Zero - The Vale of Glamorgan Council's Climate Change Challenge Plan 2021-2030
The Vale of Glamorgan Local Area Energy Plan (2024)
Maximise reduction in carbon emissions across all activity. • Improve efficiency to reduce energy demand.
Work towards new and existing buildings becoming low carbon prioritising inclusivity, equality, and fairness.
The LAEP is a live document which should be updated every 5 years. It identifies the following priority areas that will be the focus in the short term to assist in setting the Vale on the pathway to net zero: • Making homes low carbon.
Crime committed in 2011 in England and Wales is estimated to have given rise to over 4 million tonnes CO2e, equivalent to emissions of around 900,000 UK homes. Burglary resulted in the largest proportion of the total footprint (30%) due to large volume of offences and the carbon associated with replacing stolen or damaged goods.
Source: "Addressing the Carbon-Crime Blind Spot - A Carbon Footprint Approach" (2016). Helen Skudder, Professor Angela Druckman, Jon Cole, Alan McInnes, Dr Ian Brunton-Smith, Dr Gian Paolo Ansalon.
The environmental benefits of SBD are supported by independent academic research consistently proving that SBD housing developments experience up to 87% less burglary, 25% less vehicle crime and 25% less criminal damage (Note

1.5). It also has a significant impact on anti-social behaviour. Therefore, there are substantial carbon cost savings associated with building new homes and refurbishing existing homes to the SBD standard i.e. less replacement of poor-quality doors, windows and the stolen property from within the home as a result of criminal acts. This has been achieved through adherence to well-researched and effective design solutions, innovative and creative product design coupled with robust manufacturing standards.
Research documentation can be found on the SBD website at: https://www.securedbydesign.com
South Wales Police would ask that Designing Out Crime Officers are consulted to work in partnership with the Vale of Glamorgan Council to reduce the carbon emissions through building to Secured by Design Standards.
Policy 12 - Regional Connectivity
A feasibility study for a new station at St Athan was completed in 2022, which identified four potential site locations for a new station to the south of St Athan.
South Wales Police Recommendations:
• SP10 – Sustainable transport - Ensuring that the design of new developments encourage walking, cycling and public transport use as alternatives to private car use, as well as encouraging options such as mobility hubs and shared car use – South Wales Police Traffic Management Department should be consulted to ensure that sustainable transport links are safe. If these links are rail, then the British Transport Police Designing out crime officer should be contacted at the pre planning stage.
• SP16/CC1 – Net zero carbon developments: pre application consultation from South Wales Police and all new developments to meet Secured by Design.
• CI1/CC1/ SP19 – Open Space Provision: Areas of open space will normally be required to be provided on-site as part of new development proposals. Where it is not practical to make provision on-site, appropriate off-site provision or financial contributions for improvements to existing facilities will be required in lieu of on-site play, outdoor sports provision, or amenity greenspace.
• DNP7 – DARK SKIES: Secured by Design can assist with ensuring that the built environment in all forms, is designed to reduce the opportunity of Violence Against Women and Girls (VAWG) and contribute to such places feeling safe, to live, work and socialise. South Wales Police would ask that Designing Out Crime Officers are involved at the pre planning stage with the Highways Department at The Vale of Glamorgan Council and developer to discuss and be able to make recommendations in relation to lighting.

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3k5

6646 Support

Document Element: DNP7 – DARK SKIES

Respondent: Natural Resources Wales (NRW) (Paige Minahan, Advisor - Development Planning) [692]

Summary:

We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological
connectivity.

Full text:

Thank you for consulting Natural Resources Wales (NRW) on the Vale of Glamorgan Replacement Local Development Plan (RLDP) Deposit Plan, which we received on 28 January 2026.
We have reviewed the deposit plan and published documents and have recommendations on matters relating to coherence and consistency. We advise these are addressed prior to submission of the RLDP.
1. Summary
We welcome that the Vale of Glamorgan Council has declared a 'nature emergency' and in 2021 committed to a target of no net loss of biodiversity in the Vale of Glamorgan. The deposit plan takes this a step further through its vision, objectives and policies in seeking
the achievement of net biodiversity benefit. We also welcome the recognition within the deposit plan and supporting documents that additional growth within the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. We
appreciate that the deposit plan's policies seek to mitigate against these potential adverse effects with detailed wording and requirements.
However, we consider that the deposit plan would benefit from more specific mention of designated conservation sites especially where these are related to specific allocations and their associated policies. We note this issue was raised within the Integrated Sustainability Assessment (ISA) (see Section 2 below) however we do not see this recommendation properly reflected within the deposit plan itself. We consider this is a gap that should be addressed to ensure clarity within the policy requirements for any future planning applications.
General Approach to Designated Sites
In line with our role in development planning and our consultation remit, we advise that where new development may occur within or be likely to affect statutory designated sites including Special Areas of Conservation (SAC), Special

Protection Areas (SPA), Sites of Special Scientific Interest (SSSI), National Nature Reserves (NNR) and Marine Conservation Zones (MCZ) this could be more clearly identified as a key consideration especially with respect to site allocations (housing and employment). We consider that the issue of avoiding or mitigating potential impacts and utilising opportunities for supporting and enhancing these sites (as noted by para 6.401 of the deposit plan) could have more substantial recognition across the deposit plan and its supporting documents. This would improve the clarity of approach.

We have furthermore noted that Policy SP20 (Biodiversity and Ecosystem Resilience) currently excludes specific mention of designated sites (although it does refer to protected species and habitats) and we suggest that this is addressed – our comments on SP20 are set out in Section 3 of this letter.

By across the plan, we mean there is scope to include mention of relevant statutorily designated sites within the constraints text for the sites listed in Appendix B of document BP44 Infrastructure Delivery Plan (perhaps summarising in line with the approach taken to the Historic Environment Record) and within document BP32A Green Infrastructure Assessment of Key Sites, evidence which can then be reflected as appropriate in Key Sites Policies (HG1 KS1 to KS5) to inform their master planning. The Preliminary Ecological Appraisals already undertaken for Key Sites (Key Site Supporting Information) would appear to hold relevant information in this respect.

We note that document BP32A has a useful general paragraph on biodiversity assets at paras 3.7-3.8 linked to the evidence collated in the Green Infrastructure Assessment (GIA). In short, where designated sites are identified in proximity to allocated sites it would be
helpful to make clear reference to them in a consistent manner. This would bring the deposit plan more fully into alignment with the ISA findings. For any employment sites
within proximity of designated sites, we consider that the employment background paper BP12A could potentially be updated to similar effect.

With reference to omissions on this matter, we refer you to our comments on sites set out in Section 4 of this letter, including sites KS1, HG1 (1), SP14 1. and SP14 4.

Overall, we consider that the recognition of designated sites appears somewhat inconsistent in the deposit plan, although we recognise that much of this is done by the
Green Infrastructure Strategy (GIS) which incorporates the GIA.

It may be that Policy SP20 (please see our suggested amendments in Section 3 of this letter) together with addressing the meaning of “areas of high ecological value” will also go some way towards resolving the points we raise.

Master Planning

We welcome the illustrative master plans included in the deposit plan but would caveat that at the detailed stages schemes must be able to adapt, where necessary, to site
specific environmental constraints (including protected sites, species and habitats), for example in response to updated ecological appraisals or detailed species surveys.

Designs need to be flexible enough to ensure compliance with the stepwise approach (avoid, minimise, mitigate) in achieving Net Biodiversity Benefit (NBB) and improving the resilience of ecosystems as required by Planning Policy Wales, edition 12 (PPW12) and Policy 9 of Future Wales, the National Plan. We note the plan has good reference to this within Policy SP20 and supporting paragraph 6.405, thus enabling thorough consideration
at the project/planning application level and in master planning.

Please see our detailed site-specific comments in Section 4 in order to consider where our comments may lead to adjustments in master plans. For example, the species protection issues we highlight with regard to KS3 at Readers Way, Rhoose.

Strategic Opportunity at Bro Tathan

In addition to the above points, we advise that the Bro Tathan area of the Vale includes a number of different allocations and is already known as an important ecological area for great crested newts (GCN) and dormice, in particular. Given the commitments already
made under previous planning applications at the site and the necessary requirement for future biodiversity provisions, we advise a more strategic overview of the area should be considered and either set out within the deposit plan or secured within an updated GIS.

This will ensure that development in the area:

• does not cause detriment to the maintenance of the favourable conservation status of protected species;
• results in green spaces and infrastructure that is meaningfully spatially connected and sufficient in size.

Overall, we consider piecemeal development of the St Athan area will not lead to effective conservation delivery and will make the planning process less efficient at project level.

Areas of High Ecological Value

As previously noted within our preferred strategy response (Ref: CAS-244275-Q4F4, dated: 14th February 2024), the deposit plan continues to make reference to avoiding
areas of ‘High Ecological Value’ (criterion 1 of SP20). We have not been able to establish where these areas are or how their ecological value is being determined. We consider this issue needs to be clarified and ideally a definition provided.

2. Integrated Sustainability Assessment (ISA)

With regards to Section 9.9 of the ISA, we agree that additional growth in the Vale has the potential to lead to negative effects on nationally and locally designated biodiversity. The ISA concludes that the housing-specific policies set out within the deposit plan work well to
mitigate the potential adverse effects, through design stipulations and policy inclusions.

The ISA then goes on to recommend that Key Site policies are updated, where appropriate, to reference specific designated sites which they are in proximity to, in
order to help establish appropriate protection and/or enhancement measures.

We agree with these recommendations and would go further in advising that all allocations and their associated policies

should reference specific designated sites relevant to that site. For instance, we would advise Barry Woodlands SSSI and Walters Farm SSSI is identified in relation to Key Site 1 – Land at North West of Barry, and Barry Woodlands SSSI should also be identified for Housing Allocation HG1 (1) Land to the West of
Pencoedtre Lane. Please refer to our site-specific comments in Section 4 below.

3. Plan and Policy Wording
Strategic Policies
Strategic Policy SP19 – Green Infrastructure
We welcome that the GIS and GIA has informed the master planning of the Key Site allocations (6.395). To ensure this approach is carried forward for other development proposals, we consider there should be a stronger "policy hook" within Policy SP19 to link the content and evidence of the GI work to the policy and its influence on decision-making. Without this we consider there may be a risk of a policy gap/mismatch when determining planning applications.
This could be resolved by a new criterion such as:
"the provision of green infrastructure must have regard to any adopted or emerging guidance including the Green Infrastructure Strategy/Green Infrastructure Assessment
(and the Assets listed therein), and Green Infrastructure (Action) Plan for the Vale."
To strengthen Policy SP19 we also recommend an addition to the wording of criterion 2 to read:
"Protect and enhance connectivity between existing green infrastructure assets and be planned wherever possible to positively support areas of high ecological value".
We furthermore note that criterion 3 of SP19 refers to achieving net benefit for biodiversity whilst the policy overall seeks to provide, protect and enhance high quality multi-functional green infrastructure. We have previously commented that multi-functional green spaces may not always be compatible with biodiversity. It should be recognised that multifunctional uses of space can be to the detriment of the natural environment and so must be carefully considered. We recommend that paragraph 6.397 wording is updated to reflect this potential conflict so that NBB required by PPW (and as promoted by para 6.396 together with Policy SP20) is able to be prioritised and not compromised.
This point could also be raised under Policy SP4 Placemaking – at para 6.32. It should not be assumed that multifunctional spaces will also be delivering for nature in every situation and in some cases separate provision of spaces to meet biodiversity goals will be essential.
Paragraph 6.401 is welcomed regarding the opportunities that exist for the protection, maintenance and further enhancement of green infrastructure assets.
Strategic Policy 20 (SP20) – Biodiversity and Ecosystem Resilience
We welcome the inclusion of SP20 which recognises the importance of natural assets and aims to protect these. We have made comments regarding the term "high ecological value" in our Summary section at the start of this letter.
We also note that whilst reference is made to sites and areas of European, national and local importance (para. 6.402), this is not distinctly carried through within SP20 or within a specific detailed policy in the deposit plan. We advise that a more detailed policy for the Natural Environment (similar to DNP4 for the Historic Environment) could be included within the deposit plan and this should include reference to the protection of statutorily designated sites. Alternatively, SP20 itself could be updated to include reference to these in a similar manner to the approach taken to non-statutory designated sites provided by criterion 5 of SP20. We consider this would strengthen the deposit plan's alignment to section 6.4.3 of PPW12. This issue is also reflected in our feedback to the ISA as set out in Section 2.
By adding a detailed policy for the wider protection of the natural environment, there is scope to ensure a clearer message within the deposit plan regarding the need for natural resources (including land, air, water and soils) in the Vale to be protected for themselves and the essential ecosystem services they deliver. This is opposed to merely preventing pollution (deposit plan Policy DNP5). Taking such an approach would enable an
opportunity to add the consideration of Sustainable Management of Natural Resources (SMNR) into the plan policy framework rather than confining this to the deposit plan context (para 2.11) and the policy context of the GIS (page 53).
We note that Policy CC4: Renewable, Low and Zero Carbon Energy Generation is more distinct in seeking to safeguard a range of assets (including nature conservation interests and soil conservation interests) and we consider a similar policy approach may be useful
for all development proposals. We also suggest that the placemaking strategic policy (Policy SP4) could be altered in order to highlight the Natural Environment alongside its
current reference to the Historic Environment. We note that placemaking principles (Figure 11 - Identity) includes the need for development to respond to natural physical attributes of the site. This is an issue is linked to our site-specific comments (Section 4 below) where we cite, for example, the need to buffer woodlands, hedgerows and watercourses and preserve linear corridors.
Ensuring an SMNR approach will impact positively on the ground to safeguard and improve ecological networks and protect and enhance ecosystems, essential to meeting
the nature emergency. Topics we draw your attention to include river restoration where, in particular, the removal/remediation of physical modifications can make a significant impact upon water quality. The GIS provides scope to capture various projects and wider initiatives, including those based on catchment scale improvements and we welcome the opportunity to be continually involved in this work. We note and welcome the recognition of nature-based solutions within Policies SP16, SP19 and SP20 and in detailed Policy CC6.
With regards to natural assets and water resources, we consider that specific reference to water quality is lacking within the strategic and/or detailed policies. Whilst we note that water quality is mentioned within criterion 9 of Policy SP16, we consider the deposit plan should include more direct reference to the Water Framework Directive. We consider there is an opportunity for SP20 to be updated to ensure developments protect water quality and quantity. Alternatively, as mentioned above, this could fit within a detailed policy for the protection of the natural environment.
As a minor point, please note that the South Central Area Statement is not hyphenated (para 2.10 and 2.11). Please note

also that, referring to paragraph 6.404 and 6.405, the
requirements for developments to demonstrate NBB is based on PPW12, rather than The Environment (Wales) Act 2016.

Detailed Policies

Infrastructure
Whilst we note that the infrastructure requirements (such as sewerage capacity) have been investigated for certain key sites within the deposit plan, we consider there could be scope for a detailed policy to cover infrastructure requirements for all development.

Policy DNP7
We welcome Policy DNP7 of the deposit plan, which recognises the importance of preserving the natural darkness of the night sky and minimising light pollution, which we consider to be important in limiting adverse impacts upon local biodiversity and ecological
connectivity.

Policy DPN8
Please refer to comments made with regards to this policy under Section 6: Habitats Regulation Assessment (HRA).

Policy HG5 - Affordable Housing Exception Sites
We advise that, particularly given these sites are permissible outside of settlements and could be in countryside locations, criterion 6 should be amended to:
“There is no loss of land with significant recreational, amenity, agricultural, ecological or natural heritage value”.

EMP1 – Employment Regeneration Opportunity Areas
We note that the Former Aberthaw Power Station has been identified as an employment regeneration opportunity area. There are otter and water vole records on the site and we are aware of GCN records within the local area. We would advise against the inclusion of
the Aberthaw Nature Reserve within the allocation and advise that any application on the site would need to be supported by up-to-date ecological survey information and
appropriate conservation measures. Given the nature of the site, future applications will also need to be supported by appropriate land contamination investigations.

CC3 – Renewable Energy Local Search Areas
This policy identifies several sites where the potential for wind and solar development are the greatest (known as ‘search areas’). There are significant search areas located between Llantrithyd and St Hilary; no ecological information has been provided for these search areas, however given the records for GCN, water vole and otter local to these areas, it is likely that provision in the form of suitable habitats will need to be made for these species.
This could be substantial in scale, however without further ecological information we cannot advise further at this time. Notwithstanding, given the scale of the search area in this location and the likely ecological impacts, we advise that this area would benefit from spatial planning of biodiversity provision, at a greater than individual site scale.

Paragraph 2.81 – The Vale Nature Recovery Action Plan
We note reference to ‘6 broad habitat types’ including Woodland, Freshwater, Grassland, Coastal, Agriculture and Urban. We suggest this is amended to ‘6 broad ecosystems’ to reflect correct terminology and the State of Natural Resources Report 2025.

4. Strategic Sites
Overview
We previously provided detailed comments on the RLDP’s Strategic Sites, as set out in our response ref: CAS-234819-C1V3, dated 4th October 2023, which we refer you to. We welcome the additional information provided and note the inclusion of Green Infrastructure
Strategies for each of the Key Sites. However, we note that these do not include reference to protected species specifically and as a result we are unable to confirm that the provision for each site is appropriate. We observe that the road infrastructure for many of these sites severs woodlands and other substantial linear corridors. We advise that such sites are designed to minimise fragmentation in the landscape and advise that the road layouts and consequent severance is re-visited.

KS4 and KS5 are located within the vicinity of St Athan. This area is important for (and we are aware of) multiple records of GCN and dormice. Some of the area is already secured as compensation for impacts on these species associated with previous developments. We advise that the wider St Athan area is subject to spatial planning of biodiversity provision at a greater than individual site scale (as we have referenced in the Section 1 of this letter), in order to determine that:
• It does not cause detriment to the maintenance of the favourable conservation status of both GCN and dormice (strategic conservation plans should be established for both species);
• To ensure that green spaces and infrastructure are meaningfully spatially connected and sufficient in size;
We consider piecemeal development of these areas will not lead to effective conservation delivery and will cause the delivery of these sites to be less effective during the planning process.

Spatial Planning of Biodiversity
A masterplan or spatial biodiversity or GI plan should demonstrate the retention, provision and enhancement of essential areas for protected species. It should ensure that individual site-based habitat provisions are not designed in isolation but considered in association with nearby sites to demonstrate how habitat connectivity and resilience will be provided both across the site and to the wider landscape. Note that functional separation of public
open space and areas for biodiversity compensation may be required. Suitable buffers will need to be applied to any woodland and retained or created habitats on site. A sensitive lighting strategy will also likely be required for these sites. This point was raised previously during our review of the strategic candidate sites (ref: CAS-234819-C1V3, dated 4th October 2023).

Updated Surveys and Appropriate Buffer Zones
Further to the above comments, we welcome reference within the Infrastructure Delivery Plan for the requirement for updated ecological surveys and appropriate buffer zones to watercourses and retained habitat features for KS1 and KS2. Given the various ecological
constraints for each key site, we consider this advice should be included for each of the key sites.

Site Specific Comments
KS1 – Land at North West Barry
Protected Species – Dormice and bats are present on site. We advise that the masterplan is informed by surveys to ensure that biodiversity interests are maintained and enhanced. The site may require some areas to be retained an/or provision for habitats to support them. Dark areas and/or bespoke lighting scheme may also be required at project stage.
Protected Sites – The site is located in close proximity to Walters Farm and Barry Woodlands SSSI. As raised in our previous responses (CAS-234819-C1V3, dated: 4th
October 2023 and CAS-276923-N7H6, dated 17th April 2025), we have some concerns with the potential for increased and inappropriate use of the protected sites through recreational activities. We welcome that requirements have been detailed within HG1 KS1
under Green Infrastructure, Recreation Spaces and Biodiversity, which includes reference to emerging guidance for Suitable Alternate Natural Greenspace (SANG).

KS2 – North of Dinas Powys, off Cardiff Road
Protected Species – We note the supporting Preliminary Ecological Appraisal (PEA) (13th September 2022) which identifies potential for this site to support GCN, dormouse and bats. In the absence of species specific surveys, we are unable to advise whether the housing number aspirations for the site are realistic. We advise the scheme is designed to minimise severance of ecological corridors.

KS3 – Land at Readers Way
Protected Species – GCN are known to be present on this site (Readers Way Pond). The current masterplan indicates that the pond will be surrounded by built development and therefore built upon much of the terrestrial habitat which supports this pond. It is essential
that the masterplan provides a wide corridor from this pond to the wider countryside, other than via the closely managed grassland at Cardiff Airport. Any masterplan should make provision for this and any loss of habitat should be compensated for.

KS4 – Land at Church Farm
Protected Species - There are records of dormouse and GCN in the wider area. However, the supporting PEA indicates no direct impacts on the latter of the species. There appears to be extensive green space proposed in the illustrative masterplan, which we support.

KS5 – Land to the West of St Athan
Protected Species - The St Athan area is important area for GCN and dormouse. We would generally concur with the lower risk assessed for these species in association with this site. However, this is a substantial site and this and other sites in the St Athan area would benefit from spatial planning of biodiversity provision at a greater scale as reaffirmed elsewhere in this response.

5. Housing And Employment Allocations
Housing Allocations

HG1 (1) Land to the West of Pencoedtre Lane
Protected Sites: The site is within close proximity (200m) to Barry Woodlands Site of Special Scientific Interest (SSSI) and there is a risk from increased recreational use as a result of residential development, which could lead to impacts on the SSSI. Green space design must consider any emerging guidance for SANG to reduce recreational pressure on adjacent sites of biodiversity importance.
HG1 (2) Land at the Mole
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary European Marine Site (EMS). A HRA at project level will therefore be required.

HG1 (3) Land at Hayes Lane
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

HG1 (4) Land at Neptune Road
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

HG1 (5) Land between the Northern Access Road and Eglwys Brewis Road (Site C - Central Parcel)
Flood Risk: The site is located partially within Flood Zone 2 and 3 for Rivers, with the southern area of the site located within Flood Zone 3. We refer you to Sections 10.20 and 10.21 of TAN 15, which state that highly vulnerable development in Zone 3 should be avoided. Notwithstanding, we acknowledge that at masterplanning stage, there is scope to locate residential development away from areas of flood risk. We also welcome that
Appendix B of your Infrastructure Delivery Plan notes the requirement for an FCA at project level for this site.
Watercourse: Boverton Brook (Main River) runs through the site and any development will need to ensure no adverse impacts to the watercourse with appropriate buffers and design considerations.

HG1 (6) Land adjoining St Athan Road
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Rural Affordable Housing Led Sites
HG4 (1) Land to the East of Colwinston
Land Contamination: The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.

Major Employment Allocations
SP14 (1) Land east of Cardiff Airport, Rhoose
Protected Species and Protected Sites: The site is within close proximity (360m) of Barry Woodlands SSSI and there also appears to be significant potential for the site to support dormouse, GCN, otter and water vole. There are large areas of semi-natural habitats associated with this site including woodland, mature hedgerow and watercourses. These should be retained and significantly buffered from development. Connectivity between the
site and the wider environment should also be maintained. It is therefore currently not possible to advise whether the full aspirations of the site could be fulfilled.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (2) Land south of Port Road (Model Farm), Rhoose
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (3) Bro Tathan Aerospace and Business Park
Protected Species: The site is located within an important area for GCN and dormice. As mentioned, this area would benefit from spatial planning of biodiversity provision at a
greater scale to better inform allocation.
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (4) Land to the South of Junction 34 of the M4, Hensol
Protected Sites: The site is located directly adjacent to Ely Valley SSSI. Given the biodiversity interest at the site, previous applications at the site include planning
commitments to conserve and enhance grasslands habitats on the site. These commitments have not yet materialised and the requirement for these provisions should be noted within the LDP.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.

Local Employment Allocations
SP14 (5) Atlantic Trading Estate, Barry
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (6) Windmill Park, Hayes Road, Barry

Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination. The site is located over a principal aquifer. Any development would need to consider the hydrological setting of the site and vulnerability of pollution.
Flood Risk: The site is located partially within Flood Zone 3 for Sea. We advise that an FCA will be required at project level to determine any flood risk implications at the site.
Marine: An adjacent watercourse forms a hydrological link to the Severn Estuary EMS. A HRA at project level will therefore be required.

SP14 (7) Vale Business Park, Llandow
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

SP14 (8) Land at Llandow Trading Estate
Land Contamination: Given previous land use at site, a Preliminary Risk Assessment would be required at planning application stage to determine risk of land contamination.

6. Habitats Regulations Assessment (HRA)
Marine and Coastal Physical Processes
Coastal Squeeze
We note that coastal squeeze has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is that it "is unlikely that the Vale of Glamorgan RLDP will allocate many developments on
greenfield sites adjoining the estuary".
We also note that Policy CC6 specifically relates to Coastal Defences and Shoreline Management, with reference to the Shoreline Management Plans. We recommend the use of NRW's Assessment of Coastal Squeeze at the project level for anyone proposing to
undertake works to coastal structures.

Loss of Functionally Linked Habitat
As part of the Preferred Strategy consultation, we advised that consideration was given to potential impacts on migratory fish features of the Severn Estuary EMS. In particular, we referenced the River Ely and its tributaries providing supporting habitat for essential life cycle processes of some or all the diadromous fish species.
Within the deposit plan HRA, it is noted that likely significant effects to the migratory fish features of the Severn Estuary EMS has been ruled out, as none of the sites allocated in the RLDP lie in close proximity to the River Ely and connected watercourses. We therefore
agree with this conclusion.
In relation to bird features, Table 8 of the Appropriate Assessment identifies many key sites and allocations with high to medium potential for functional linkage to the Severn Estuary EMS. We note that loss of functionally linked habitat has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational
Pressure' within the deposit plan.

Policy DNP8
We advise that clarification is needed in relation to this policy, as while we welcome the supporting text regarding functionally linked land outlined in paragraph 6.76 of the HRA, the policy is mainly focused on recreational pressure and is titled as such. We also note a discrepancy between the policy wording in paragraph 6.76 and Policy DNP8 in the deposit plan itself.

Visual and Noise Disturbance (During Construction)
Within the deposit plan HRA, visual and noise disturbance has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. The justification for this is through the inclusion of recommendations outlined in 6.83 of the HRA to the supporting text of Policy SP20, which we welcome.
We also welcome the recommendation in relation to potential functionally linked land as outlined in paragraph 6.84 of the HRA.

Recreational Pressure
Within the deposit plan HRA, recreational pressure has been screened in and taken through to Appropriate Assessment where a conclusion of no adverse effect was reached. Again, the justification for this is the inclusion of 'Policy DNP8 – Severn Estuary Recreational Pressure' within the deposit plan, which as above, we advise needs
clarification.
We note that no visitor data has been collected from access points within the Vale of Glamorgan, but we welcome reference to the visitor surveys undertaken by
Monmouthshire and Torfaen, as well as the 2022 visitor survey commissioned by Stroud District Council.
We note that paragraph 6.25 of the HRA states that "three Key Sites and several other housing allocations lie within the 12.6km core recreational catchment that has been
deemed most appropriate for the Severn Estuary SAC/SPA/Ramsar". However, we also note that Table 6 in the HRA only includes two Key Sites requiring mitigation, with KS3 being omitted. We advise that clarification is needed at the project level as to whether developments are situated within the 12.6km catchment area.

7. Strategic Flood Consequence Assessment (SFCA)
We have reviewed the submitted SFCA and agree with the scope of the assessment made.
We note there is currently an upper catchment Natural Flood Management (NFM) / Nature Based Solutions (NbS) project on the Cadoxton to reduce flood risk to Dinas Powys, Any updated SCFA should have regard to NFM schemes being progressed in their area and
proposals should be clearly outlined in the Development Plan (in accordance with TAN 15 2025).

8. Green Infrastructure Strategy (GIS)
We understand that the published GIS has not been updated to reflect the latest stage of the deposit plan and refers only to the preferred strategy stage (para 2.2.3). We previously provided advice on the Green Infrastructure Assessment (GIA) (re: CAS-252087-F0H1, dated 14th May 2024) which is included within the GIS. We refer you to these comments, noting that the GIS will be kept under continual review (para 1.2.5).

Change suggested by respondent:

-

Sound: Not specified

Attachments:

Email representation redacted - https://valeofglamorgan.oc2.uk/a/3pq

6793 Object

Document Element: DNP8 – SEVERN ESTUARY RECREATIONAL PRESSURE

Respondent: Persimmon Homes (East Wales) [1068]
Agent: Boyer Planning

Summary:

Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.

The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.

From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.

Full text:

This submission relates to the site known as 'Land North of Dinas Powys' and builds upon previous responses provided in respect of the Call for Sites exercise in September 2022 and more recently Preferred Strategy in February 2024.
For context the site is identified as part of Candidate Site Ref. No 444 within the latest Candidate Sites Assessment (Background Paper – BP18A) which has been published as part of the supporting evidence base.
As you are aware to date Persimmon have presented, what is in effect, two options for the development of the site with a Smaller Option (extending c13ha) and an Extended Scheme (extending to c31ha). Whilst there are significant benefits of both schemes this representation will focus on the smaller option which has been identified as a proposed site allocation for residential development within the Deposit under Policy HG1 – KS2 'Land North of Dinas Powys'.
Having reviewed the Deposit Plan it is evident that the document is structured around a number of key themes/ sections. For convenience this submission discusses each of which in chronological order and should be considered in conjunction with the accompanying technical reports/ plans provided to date.
The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):

- Test 1 – Does the Plan Fit?
- Test 2 – Is the Plan Appropriate?
- Test 3 – Will the Plan Deliver?

Section 3: Key Characteristics
Settlement Pattern
In principle, Persimmon support the Settlement Pattern as set out in Section 3 and in particularly the identification of Dinas Powys as a Primary Settlement.
Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Persimmon consider that Dinas Powys, in particular, is capable of a higher role/ function and thus accommodate even further levels of growth. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Market and Housing Need
In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is

particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.

Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.

Section 4: Key Themes, Vision & Objectives

Key Themes

Persimmon supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect site Land north of Dinas Powys provides an opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location, whilst also facilitating additional services and facilities as part of the proposed offer.

In principle, Persimmon support the 'Placemaking' theme and consider that the proposed allocation in Dinas Powys shall ensure a strong sense of identity is achieved.

Persimmon also support the theme of 'Promoting active travel and sustainable transport choices', and highlight that the proposed residential development at Dinas Powys clearly further assists in ensuring that the new development be in a highly sustainable location with very good access to alternative transport, other than the private car.

Vision

In general, Persimmon support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements to deliver sustainable and high-quality residential development also needs to be suitably recognised.

The site Land north of Dinas Powys clearly aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand. Whilst simultaneously facilitating much needed additional infrastructure improvements to further enhance Dinas Powys' role as a Primary Settlement thereby supporting both existing and future residents.

In light of the above it is considered that Dinas Powys plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.

Strategic Objectives

Objective 3 – Home for All

Persimmon supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Persimmon supports the notion of providing residential development in places which people want to live, and in particular Dinas Powys as a Primary Settlement.

Objective 4 – Placemaking

As above, in principle Persimmon support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.

Our site in Danis Powys aligns with such principles whilst also providing an opportunity to facilitate a logical extension to the existing urban form and in doing so meet local need in a sustainable matter. The scope of which includes full market and affordable housing in accordance with proposed policy requirements along with ample public open space, active travel links via dedicated pedestrian footpaths and cycleways and SuDS features.

Objective 8 – Promoting Active and Sustainable Travel Choices

Persimmon supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Dinas Powys has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.

Moreover, the proposed allocation would also facilitate both on-site and off-site infrastructure improvements further enhancing the existing excellent accessibility to Eastbrook Station. Therefore, providing an opportunity to encourage a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint the proposed allocation at Land north of Dinas Powys (HG1 KS2) is therefore crucial to ensure growth is prioritised in such a highly sustainable location and maximise opportunities for greater connectivity at both a regional and local level.

Section 5: Sustainable Growth Strategy

RLDP Sustainable Growth Strategy comprises six key elements as follows:

1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).

In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Persimmon support the proposed approach, however maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.

Whilst we appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan. It is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual

completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
In light of the above we believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
As evidence above, the proposed allocation Site Ref HG1 KS2 – Land to the North of Dinas Powys, represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering units in the first five years of the emerging plan period.
Persimmon Homes remain fully committed to the development opportunities presented by the site and its progression as a proposed allocation within the RLDP. The latter is essential in assisting the Vale of Glamorgan meet local housing need which ultimately goes to the heart of the plan and ensuring it has been soundly prepared.

2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
Persimmon supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Dinas Powys as the most sustainable primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria (as shown within the table below), it is clear Dinas Powys is considered to be the third most accessible settlement to modes of public transport which clearly aligns with the Council's intension to pursue a transport orientated spatial strategy for future growth. On this basis it is evident that Dinas Powys is more sustainably located when compared to Cowbridge and Llantwit Major, and therefore warrants a higher ranking within the Settlement Appraisal Review and thus greater levels of growth within the RLDP.
Tables 1& 2. Extracts of Key Settlement, Service Centres & Primary Settlement Scores from Settlement Appraisal Review (BP5)
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
Persimmon supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Persimmon wholly agree with this approach on the basis that this would enable the RLDP to achieve a more sustainable pattern of development and in doing so support growth over the emerging plan period.
In order to help identify suitable locations for future development Transport for Wales have produced isochrone maps which delineates different travels times for walking and cycling around each of the existing railway stations in the Vale. Most notably the site known as at 'Land North of Dinas Powys' is situated within 5-10 minutes walking / 0-5 minutes cycling distance to Eastbrook Station and 15-20 minutes walking/ 5-10 minutes cycling distance from the station at Dinas Powys. This evidence clearly demonstrates the proposed site represents one of the most sustainable locations for residential-led growth and thereby justified its position within the RLDP as a key allocation.
Land North of Dinas Powys further strengthens the spatial strategy by prioritising development at a location that is well served by existing rail stations. Focusing growth in settlements with established rail connectivity ensures that future

residents have direct access to sustainable transport infrastructure from the outset. This approach supports a more sustainable pattern of development by reducing reliance on the private vehicle and encouraging a modal shift towards rail, alongside walking and cycling for local trips.
By directing development to locations well served by existing bus and rail infrastructure , the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
Moreover, the proposed allocation HG1 KS2 presents a significant opportunity to support local facilities and facilitate green infrastructure provision within a highly accessible and sustainable location. The scope of which shall include ample public open space, dedicated active travel links via pedestrian footpaths and cycleways, Sustainable Drainage Systems (SuDS) features, and other associated infrastructure. Integrating these elements at the heart of the site shall enable residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport connections.
In terms of the overall distribution of growth, Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail infrastructure as depicted by the strategic transport corridor within the RLDP Key Diagram (Figure 10). However, to optimise the effectiveness of this strategy it would be prudent to focus growth in areas of greatest demand.
Paragraph 3.14 of the Deposit Plan explains that a significant proportion of the population increase in the Vale over the past 10 years has been as a direct result of a people migrating from Cardiff to the Vale, with the Vale ultimately experiencing a net increase of an average of 716 people per year for the period 2011-2021. These principles should therefore be better reflected in the general pattern of development set out within the RLDP. This would be achieved by prioritising higher levels of growth in areas such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
Focussing further growth in well-connected, sustainable locations such Dinas Powys will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

Figure 1. Extract of Key Diagram/ Strategic Growth Area from Deposit Plan
Section 6: Policy Framework
This section identifies the strategic policies, criteria-based development management policies, site specific allocations and designated areas to be protected. These are broadly arranged by topic theme under the key policy headings set out in PPW which are reflected below.
Strategic and Spatial Choices (Placemaking)
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)
This policy states that in order to deliver the Sustainable Growth Strategy for the VoG, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst Persimmon supports the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
As noted, Persimmon are wholly in support of Key Housing-Led Site Ref. KS2 - North Dinas Powys, off Cardiff Road, which seeks to actively contribute towards the housing requirement.
However, the Deposit Plan also needs to recognise that there exists an opportunity to further extend the allocation to provide a logical extension to the defined urban area of Dinas Powys and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
This additional land is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Persimmon consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and

potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.

For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold, and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.

More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.

Whilst Persimmon appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range. Having reviewed the Deposit Plan evidence base we believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.

In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).

Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).

In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need.

Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual

As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

Although Persimmon acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036), and therefore is made up of sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

Table 3. Extract of the Vale of Glamorgan's Housing Supply and Housing Requirement

From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Persimmon's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising the use of sites such as Land north of Dinas Powys, to ensure the emerging local plan complies

with the Welsh Government's aspirations set out within Future Wales.
As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.
Table 18 of the Development Plan Manual (DPM) is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset, but also enable a more consistent supply of homes to be achieved over the plan period as a whole.
Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.
Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.
Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025. Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the VoG would detrimentally impact upon housing delivery or 'compete' with Cardiff.
In summary, Persimmon supports the overall medium growth strategy and key allocations such as North Dinas Powys. Although given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance is necessary to the ensure the RLDP is able to effectively meet local need over the plan period. From a practical standpoint whilst further sites may well be required to accommodate the additional growth, it is important the current proposed allocations are safeguarded and therefore supplemented accordingly. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
Policy SP2 – Settlement Hierarchy
In principle, Persimmon supports the Settlement Pattern set out in Policy SP2, particularly the identification of Dinas Powys as a Primary Settlement.
Whilst the role of Primary Settlements is acknowledged, in that they contain several key services and facilities, vital to supporting sustainable communities including primary schools, small convenience shops, food and drink outlets and employment opportunities.
Persimmon considers that Dinas Powys is capable of fulfilling an enhanced role given its proximity to strategic transport infrastructure which provide regular services to key designations throughout the region and Cardiff city centre. Whilst the proposed allocation HG1 KS2 undoubtedly supports such principles, given the area is inherently well served by existing infrastructure we maintain that it has the capacity to accommodate even further levels of growth, which could be delivered through the extended Candidate Site (Ref. No. 444). This approach would align with the Council's spatial strategy given that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally subject to greater physical and environmental constraints.
Policy SSC1 – Development within Settlement Boundaries
Persimmon Homes support the premise of Policy SSC1, and the objective of directing development to areas within defined settlement boundaries. This approach will help reinforce sustainable growth patterns and prioritise development in locations well served by both existing and planned infrastructure. Collectively these principles align with the Councils ambitions for Land north of Dinas Powys (HG1 KS2) and supporting local services and facilities to reduce overreliance on private vehicle travel.
Policy SP4 – Placemaking
In principle Persimmon Homes supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.
The proposed allocation Land north of Dinas Powys has been designed with landscape led approach and therefore clearly aligns with the placemaking principles set out in Policy SP4 and the sustainable placemaking framework of PPW12. The site's location on the edge of Dinas Powys enables the scheme to positively responds to the character of the local area whilst remaining in keeping with the wider landscape setting. The layout reflects the prevailing scale and form of surrounding neighbourhoods, incorporating similar architectural cues and a coherent street hierarchy. Green infrastructure forms the structural framework of the masterplan, integrating retained landscape features, new planting, and sustainable drainage measures to ensure climate resilience and biodiversity enhancement. The density proposed

makes efficient use of land in accordance with national policy while remaining sensitive to local character and the edge-of-settlement context.
In line with PPW12's emphasis on health and well-being, the scheme promotes active travel that connects to existing pedestrian routes, public transport links and community facilities within Dinas Powys. The development prioritises walking and cycling, supports access to local schools, shops and services, and reduces reliance on the private car.
Public open spaces have been prioritised towards the centre of the scheme and homes orientated accordingly to promote natural surveillance, thereby creating a safe area that encourage recreation, social interaction and community cohesion. The integrated green network delivers benefits such as improving general air quality and strengthening ecological connectivity within the Vale of Glamorgan.
The proposal also reflects the design principles set down within the Design Commission for Wales in respect of quality architectural design, contextual response and multifunctional spaces. This will be achieved through a balanced mix of housing types and tenures responds to local need. Careful consideration has also been given to the wider landscape setting of Dinas Powys, ensuring that key views, settlement edges and local character are respected and enhanced.
Policy PGD1 – Creating Well Designed and Inclusive Places
Persimmon question the need for both Policies SP4 and PGD1 as there is notable repetition between the two. In principle the criteria set out within the proposed policy aligns with our expectations, however there is a need to recognise that not all criteria will be able to be accommodated on development sites. Particularly given the need to accommodate other legislative requirements relating to environmental and economic matters that warrant equal consideration as part of the planning process.
On that basis if the Council are minded to continue with this particular policy's inclusion, we request the proposed wording be updated to clarify that such the merit of such principles will be considered on a site-by-site basis rather than the current blanket approach suggested.
Policy PGD2 – Residential Development Densities
Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the proposed density achieves a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.
From a planning standpoint, Persimmon support the Councils approach to prioritise higher density development in Key Settlements, Service Centres and Primary Settlements. These locations are naturally better connected to existing transport infrastructure, modes of public transport, Active Travel routes and local services/facilities to accommodate future growth.
A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.
The density requirement appears to be reasonable in its approach, and the flexibility to allow individual site adjustments (as per the remaining text within the Policy) is welcomed. As there will undoubtedly be occasions where the density will need to be considered in further detail due to other on-site factors/ mitigation measures.
Possibly update to highlight support for higher net densities being prioritised in Key, Service Centres and Primary Settlements which are naturally well served by regular public transport provision and Active Travel routes, or near to services and facilities.
Policy SP5 – Creating Healthy & Inclusive Places and Spaces
Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.
Table 4. Extract of Proposed Criteria for HIA Assessments
The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its

adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.

Active and Social Places
Policy SP6 – Housing Requirements
Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.
Policy HG1 – Housing Allocations
HG1 KS2 – Land to the North of Dinas Powys
Persimmon wholly support the inclusion of Land to the North of Dinas Powys (HG1 KS2) as a proposed site allocation within the emerging RLDP. The site represents a logical extension to the existing settlement of Dinas Powys and provides an opportunity to address local housing needs within a highly accessible and well-connected location. Given its position adjacent to the existing settlement boundary of Dinas Powys, the site also is also well served by existing services, public transport links, schools and community facilities, thereby reducing reliance on private car travel and supporting national and local placemaking objectives.
The proposed scheme has also been designed to make effective use of land that is both logically related to the existing urban form and clearly aligns with the Council's growth strategy. Given the level of demand in the area, a particularly significant benefit of proposed allocation HG1- KS2 is the commitment to deliver a minimum of 100 affordable homes, representing 40% of the total provision. The site will therefore make a meaningful contribution to meeting locally needs and incorporate a mix of tenures that directly responds to the Vale's LHMA/evidance base. These principles align with the Councils aspirations to foster more inclusive communities and thus remain consistent with Policy SP4 and Policy PGD1. From a design perspective the proposed scheme has also informed by a comprehensive masterplanning process ensuring that high quality design, integrated green infrastructure, and sustainable transport connections integrated throughout the proposed layout.
Ecological considerations have similarly informed the proposed layout for the site. Technical work, including the Preliminary Ecological Appraisal and subsequent strategy documents, have confirmed suitable biodiversity enhancements can be delivered through a network of retained and reinforced green corridors, historic woodland protection, and supplementary planting. The masterplan prioritises ecological connectivity, incorporating wildlife corridors, dark routes for nocturnal species, and extensive areas of multifunctional open space. These measures not only mitigate potential impacts on identified species, such as dormice, but provide clear opportunities for biodiversity net gain in accordance with the Environment (Wales) Act 2016. The integration of Sustainable Drainage Systems within landscaped areas further demonstrates how flood attenuation, habitat creation and recreational provision can be delivered in a cohesive manner. Thereby ensuring that environmental enhancements are incorporated throughout the scheme from the outset which fully accord with the RLDP's objectives in that respect.
In transport and community infrastructure terms, the site's sustainable credentials are equally compelling. The proposed access arrangements onto Cardiff Road have been refined in response to feedback from the highway department, whilst demonstrating deliverability and promoting safe access for all users to avoid having any adverse impacts on local highway network. Geographically the site also lies within immediate walking distance of Eastbrook and Dinas Powys rail stations, which inevitably aligns with the Council's transport-orientated growth strategy. In turn these principles accord with national placemaking objectives set out in PPW12 and shall actively encouraging a modal shift away from private vehicles to incentivise more active forms of travel. Most notably this includes dedicated pedestrian and cycle links through the site providing connectivity with a range of local services and facilities.
By virtue of the above we fully support the proposed allocation of Land to the North of Dinas Powys (HG1 KS2). As the proposed developer Persimmon Homes remain committed to development opportunities the site presents and its ability to help deliver much needed full market and affordable homes in a highlight sustainable location, which clearly accord with the Council's proposed growth strategy.
Policy HG1 (B) – Housing Allocations
HG1 (3) Barry - Land at Hayes Lane
Persimmon Homes question to suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
Unsustainable Location & Poor Connectivity
Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's), and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by

Transport for Wales (TfW) to support resident development. Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.

As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.

The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.

Loss of Allocated Employment Land

Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.

Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.

By virtue of the above, Persimmon Homes object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Dinas Powys.

HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)

Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.

According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.

On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The overarching purpose of which shall be to ensure the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.

Policy HG3 – Housing Led Redevelopment Opportunity

Persimmon Homes acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.

Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.

Although we welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.

This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.

Policy SP7 – Affordable Housing Provision

In principle, Persimmon support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.

As mentioned above Persimmon maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexible allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.

National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.

To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.

Policy SP8 – Affordable Housing Requirements

Persimmon supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed are viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.

On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted.

Policy SP10 – Sustainable Transport

Persimmon support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Dinas Powys and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.

In this regard, the extend site at Dinas Powys represents a suitable and deliverable opportunity that aligns fully with the objectives of Policy SP10. The Authority will be aware that Transport Strategies were submitted at earlier plan-making stages, and these have now been refined through a Technical Note prepared by Vectos (now SLR) in direct response to the Candidate Sites Assessment. The scope of which confirms the proposed access arrangements presented within Policy HG1 KS2 with regards to the primary and secondary vehicular entry/ egress points on to Cardiff Road are acceptable. The former includes the creation of a new signalised junction on to the A4055/ Cardiff Road which has been modelled by Vectos (now SLR) to confirms there will be no adverse impacts with regards to the overall capacity of the local highway network. Furthermore, these measures shall be supplemented by financial contribution towards off-site improvements to help alleviate any existing connection issues/ pinch points and thus enable traffic to flow more freely within Dinas Powys and the wider surrounding area.

In addition, the scheme will deliver significant active travel benefits, including dedicated pedestrian footpaths and cycleways throughout the site that connect seamlessly into the surrounding network. The site lies within immediate walking distance of Eastbrook and Dinas Powys railway stations and therefore aligning with the Vale's transport-orientated growth strategy. Overall, the refined Transport Strategy demonstrates that the development would not result in any significant adverse impact on the highway network, while actively promoting sustainable travel choices. Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.

Policy TR1 – Transport Proposals

Persimmon supports the overarching objectives of Policy TR1, which seeks to protect and enhance strategic transport infrastructure across the Vale of Glamorgan, including active travel routes, public transport schemes and highway improvements. Land north of Dinas Powys aligns with these objectives by directing growth to a sustainable settlement capable of supporting integrated transport solutions. The scheme has also been designed to incorporate dedicated pedestrian and cycle routes that ensures development sympathetically integrates with the surrounding area. Most notably that includes measures to enhance pedestrian permeability whilst also encouraging a shift towards more sustainable modes of travel.

In addition to the above, allocation future growth at Land North of Dinas Powys will support planned improvements between the Barry/Biglis roundabout and Dinas Powys Active Travel Route by providing on-site pedestrian and cycle infrastructure that links directly to the proposed 2 km shared walking and cycling corridor. By aligning the site layout and

access points with this strategic route the scheme shall naturally maximise the route's functionality, safety and long-term success.
Finally, the site's highly sustainable location reinforces its accordance with the Council's transport-led growth strategy. The development is within immediate walking distance of both Eastbrook and Dinas Powys railway stations, which provide frequent services to Cardiff and Barry other key destinations. Prioritising residential growth in such locations continues towards the Vale of Glamorgan's aim of creating a more sustainable pattern of development, maximising the use of public transport, supporting active travel and reducing reliance on private cars.
Policy SP13 – Community Infrastructure and Planning Obligations
Persimmon Homes do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for planning purposes and risk unnecessary duplication.
Policy CI1 – Open Space Provision
Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision. As such Persimmon query the requirement for an Open Space Strategy for all sites that meet the thresholds.
The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site.
Productive and Enterprising Places
Policy CC1 – Residential Operational Net Zero Carbon Development
Persimmon Homes, strongly object to Policy CC1 on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
Building Regulations Part L currently sets the requirements for energy efficiency in new homes, with the current dwellings built by Persimmon Homes being designed to exceed the minimum requirements of Part L by incorporating enhanced insultation and improved building fabric performance. This includes low U-values for key elements such as walls, roofs, floors and windows to minimise heat loss and improve overall energy efficiency. As a result, Persimmon Homes are achieving a high rating under the Energy Performance Certificate (EPC) System, typically within the A-B range.
Introducing a separate and potentially more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 is not considered justified or appropriate and thereby conflicts with the second test of soundness set out within the DPM.
The proposed step change in standards from 1 April 2030 (particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year) represents a significant and abrupt step change in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards are able to be delivered on mainstream housing sites without compromising their overall viability. On that note the Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of which the proposed policy could well prevent housing delivery and undermines the emerging RLDP's ability to effectively meet housing need.
Further to the above Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This contradicts the benefit of a consistent national approach through Building Regulations and makes it significantly more difficult for mainstream housebuilders operating across multiple authority areas to deliver homes efficiently. The DPM emphasises the need for development plans to create policy frameworks that encourage housing delivery and avoid unnecessary complications. By introducing bespoke operational monitoring requirements and energy modelling thresholds the policy as currently worded blurs the boundary between planning and Building Control functions. In turn this raises concerns as to whether the policy is justified and capable of being applied consistently across the board.
Finally, the Council's own Viability Assessment (Paragraph 6.60 of BP42) acknowledges current uncertainty given the outcome of Welsh Government's consultation on this topic are still unknown at the time of writing. In the event the Welsh Government decide to peruse national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. Once again, this reinforces Persimmon's concern that Policy CC1 is premature and not in general conformity with national policy. As drafted, the policy risks undermining the council's proposed housing supply, affordable housing delivery rate and general implementation over the plan period. For these reasons, we believe it fails to meet the relevant tests of soundness and should be omitted from the proposed RLDP.
Distinctive and Natural Places
Policy SP19 – Green Infrastructure
In principle Persimmon Homes support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
For completeness the proposed allocation (Land at north Dinas Powys) has been informed by a comprehensive Green Infrastructure Strategy and Landscape Summary Note prepared by Tir Collective (August 2023). The reports demonstrate that the site has been designed in a manner consistent with the objectives of Policy SP19. While future

development of the site technically requires a release from the locally designated Green Wedge between Dinas Powys, Penarth and Llandough, the scope of which is limited in nature. Paragraph 3.70 of PPW12 states that Green Wedge boundaries should only include land that is required to remain open for the longer term. In this context, the Council's Green Wedge Background Paper indicates that proposed allocation HG1 KS2 shall not result in any coalescence between settlements and nor does it make a significant contribution to the overall integrity of the designation. These factors confirm that the site is suitable for accommodating future residential development.
The emerging masterplan adopts a landscape-led approach that responds to the site's physical characteristics and surrounding context. Development has therefore been excluded from the most visually sensitive parts of the site which will instead be retained as public open space to avoid having any adverse impact in that respect. This approach is reinforced through the retention and enhancement of existing hedgerows, woodland and field boundaries, alongside supplementary planting to naturally integrate the site into the wider landscape framework.
Policy SP20 – Biodiversity and Ecosystem Resilience
In principle, Persimmon support the objective of Policy SP20 which intends to protect and enhance biodiversity and ecosystem resilience. However, in the interests of soundness we believe the proposed requirement relating to biodiversity enhancement should be reframed to ensure it remains consistent with national policy. In particular, the policy should clarify that development proposals are expected to deliver biodiversity betterment in a manner that is proportionate to the scale and nature of development and consistent with national guidance. The wording should avoid introducing a requirement for a specific or quantified biodiversity net gain approach that goes beyond the national policy framework. Ensuring that the policy reflects the approach set out in Planning Policy Wales 12 will provide greater certainty for applicants and decision-makers while still providing sufficient comfort in securing the requisite biodiversity improvements.
Policy DNP1 – Special Landscape Areas
Persimmon support the revision of the Cwrt-yr-Ala Basin Special Landscape Area (SLA) to reflect the allocation of key site (HG1KS2 North of Dinas Powys off Cardiff Road) as per Policy DNP1. As indicated in Background Paper BP28 – Special Landscape Areas, the future development proposals for the site will be required to incorporate mitigation to reduce the impact of the site on the SLA. These works are incorporated into the proposed masterplan.
Policy DNP2 – Green Wedges
Persimmon support the revision to the green wedge between Dinas Powys, Penarth and Llandough, at Policy DNP2 (1) which has been amended to reflect the key site allocation HG1KS2 North of Dinas Powys.
Policy DNP8 – Severn Estuary Recreational Pressure
Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Persimmon appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidance. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
Conclusion
Subject to the comments within this response, Persimmon are broadly supportive of the Deposit RLDP put forward. Persimmon Homes' most pertinent comments on the consultation document are summarised below:
• Persimmon fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of greatest demand, such as Dinas Powys, which is not only the nearest settlement geographically to Cardiff but also inherently well connected by the existing rail network and other modes of public transport.
• Persimmon support the principle of the Settlement Hierarchy and the identification of Dinas Powys as a Primary Settlement. Whilst the importance of which is noted, Persimmon maintain that Dinas Powys, in particular, is capable of a higher role and function which can be accommodated in the extended Candidate Site Ref. No 444. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Whilst Persimmon supports the overall principle of a medium growth strategy and key allocations such as North Dinas Powys. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic

under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Persimmon therefore conclude that a higher flexibility allowance and additional site allocations, such as the extended option at Dinas Powys, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Persimmon welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Persimmon appreciate the overarching purpose of Policy DNP8 (Severn Estuary Recreational Pressure). In its current form the proposed policy lacks sufficient information to understand how it will operate in practice. Whilst supporting text suggests that key details relating to mitigation delivery will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• Persimmon are wholly supportive of Land North of Dinas Powys' (HG1 KS2) position as a proposed allocation within the emerging RLDP. The site represents a suitable, available and deliverable location for residential development without any constraints preventing it from delivering much needed homes in line with the Council's proposed housing trajectory. Furthermore, its position as a key site is crucial to ensure growth is prioritised in such a highly sustainable location, adjacent to the defined urban area of Dinas Powys, and maximise opportunities for greater connectivity at both a regional and local level.
Persimmon would welcome the opportunity to continue on-going conversations with Officers and subsequently support the site's progression through the next stages of the plan-making process.

Change suggested by respondent:

The scale and mechanism of any contributions must be clearly established as part of the plan-making process.

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/38r

6926 Object

Document Element: DNP8 – SEVERN ESTUARY RECREATIONAL PRESSURE

Respondent: Barratt Redrow Homes [2669]

Agent: Boyer Planning

Summary:

Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.

The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced, the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.

From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.

Full text:

1. INTRODUCTION
1.1 These representations build upon the responses previously provided to the Call for Sites Consultation, additional information submission, and more recently the Barry Growth Paper in July 2025. For the avoidance of doubt these

representations relate to Barratt Redrow Homes' land interest know as 'Swn Y Coed, Wenvoe'. The site has previously been identified as Ref No 437 within the Council's Candidate Site Assessments including the Preferred Strategy Stage, which has been published as part of the technical evidence base and background papers alongside the Deposit Plan.
1.2 Having reviewed the Deposit Plan it is evident that the document is structured around a number of key sections including:
• Section 3 – The Vale of Glamorgan Key Characteristics;
• Section 4 – RLDP Key Themes, Vision, and Objectives;
• Section 5 – Sustainable Growth Strategy; and
• Section 6 – Policy Framework.

1.3 For completeness this submission shall discuss each section in turn.
1.4 The overarching purpose of which shall be to respond to the relevant draft Replacement Local Development Plan policies, with particular consideration given to the Welsh Government's tests of soundness as set out within the Development Plan Manual for Wales (Third Edition) March 2020)):
• Test 1 – Does the Plan Fit?
• Test 2 – Is the Plan Appropriate?
• Test 3 – Will the Plan Deliver?

2. THE VALE OF GLAMORGAN KEY CHARACTERISTICS
Settlement Pattern
2.1 Barratt Redrow support, in principle, the Settlement Pattern as set out in Section 3 of the Deposit Plan and in particular the identification of Wenvoe as a Primary Settlement.
2.2 Paragraph 3.9 explains that primary settlements "offer several key services and facilities, which are vital to their role as sustainable communities, as they reduce the need to travel to Barry or the Service Centre Settlements to address day-to-day needs".
2.3 The importance of the Primary Settlements in supporting the Service Centre Settlements is noted, however Barratt Redrow consider that Wenvoe, in particular, is capable of a higher role and function and can accommodate a higher level of growth over and above affordable led exception sites, which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
Housing Need
2.4 In light of the Vale of Glamorgan's strategic location in-between Cardiff and Bridgend, and the significant employment opportunities associated with these areas, the Deposit RLDP should seek to maximise housing provision to ensure a more sustainable balance is achieved between homes and jobs, and in turn reduce commuting distances/ carbon emissions.
2.5 Paragraph 3.18 clearly acknowledges the scale of affordable housing need, identifying a requirement for 1,075 affordable homes per annum between 2023–2028 and 154 per annum thereafter. Yet it remains unclear whether existing unmet need has been fully factored into the overall housing requirement presented within the Deposit RLDP. This is particularly importance in the context of the Welsh Government's 2025-based estimates which identify 9,400 units of unmet need at a national level and a requirement for 8,700 additional homes per annum over the next five years simply to address newly arising need.
2.6 Accordingly, there is a compelling justification for a further uplift in housing numbers to ensure the Plan proactively addresses both existing and emerging need. Increasing the overall housing requirement would directly enhance the overall delivery rate for affordable homes which is crucial in a local authority area with the highest affordability ratio in Wales. Paragraph 3.17 confirms that in the Vale average house prices are 9.7 times average workplace earnings compared to the Wales average of 6.1, therefore a step change in housing targets is needed to support a more balanced housing market across the region.
3. RLDP KEY THEMES, VISION, AND OBJECTIVES
3.1 Section 4 of the Deposit RLDP sets out the Council's vision over the emerging plan period. The vision establishes a series of strategic goals the Council intends to work towards and in doing so provides an insight into how the Vale of Glamorgan is envisioned to develop up to 2036.
Key Themes
3.2 Barratt Redrow supports the theme 'Homes for all' and the need for the housing supply to respond to the growing population and provided in appropriate locations, with a mix of tenure and types. In that respect the site at Swn Y Coed, Wenvoe offers a sustainable and deliverable opportunity to ensure future residential development aligns with such objectives to deliver high quality housing development in a sustainable location.
3.3 In principle, Barratt Redrow support the 'Placemaking' theme and consider that development in Swn Y Coed, Wenvoe would ensure a strong sense of identity and that the scheme is capable of providing a well designed and sustainable development.
3.4 Barratt Redrow also support the theme of 'Promoting active travel and sustainable transport choices', and in particular the need to ensure that the new development will be in a highly sustainable location with very good access to alternative transport, such as bus services, rather than a reliance on the rail network. This is clearly evident at Swn Y Coed, Wenvoe.
Vision
3.5 In general, Barratt Redrow support the RLDP Vision, however highlight that whilst Barry and other Sustainable Service Centres are identified as playing a vital role in delivering the strategy, the importance of the ability for Primary Settlements, such as Wenvoe, to deliver sustainable and high-quality residential development also needs to be suitably recognised.

3.6 The allocation of Swn Y Coed (Candidate Site Ref: 437) is capable of providing a comprehensive residential development in a highly sustainable location and within an important Primary Settlement. The principle of which aligns with the Council's ambition to ensure future growth delivers homes which caters for all (including affordable homes) and are prioritised in areas of greatest demand.
3.7 In light of the above it is considered that Wenvoe plays a significant part in delivering the Council's strategy and the role, function, and ability of this settlement to accommodate growth needs to be significantly reinforced. The settlement is capable of accommodating more growth in a highly sustainable location we believe warrants greater recognition within the vision itself.
Strategic Objectives
Objective 3 – Home for All

3.8 Barratt Redrow supports the principle of Objective 3, in particular the provision of high quality housing which includes the right mix, tenure and type. Barratt Redrow supports the notion of providing residential development in places which people want to live, and in particular Wenvoe as a Primary Settlement.
Objective 4 – Placemaking
3.9 As above, in principle Barratt Redrow support the Council's placemaking objectives which seeks to ensure all development will contribute positively toward creating a sense of place. Most notably this involves prioritising future growth in sustainable locations which are placed to create attractive, safe and accessible schemes that are equally effective from a functional standpoint.
3.10 The proposed allocation at Swn Y Coed (Ref 437) at Wenvoe aligns with such principles whilst also providing an opportunity to facilitate a high quality, mixed tenure residential development of circa 80+ open market & affordable homes, with a high-quality distinct character responding to the site context and creating a sense of place.
Objective 8 – Promoting Active and Sustainable Travel Choices
3.11 Barratt Redrow supports the principle of promoting active and sustainable travel choices and highlight that their residential development at Wenvoe has been designed to ensure accessibility it's at the heart of the scheme with regards to walking, cycling and connectivity to public transport.
3.12 Given the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
3.13 Therefore, the site provides an opportunity to promote a modal shift towards more active forms of travel and consequently reducing dependency on private vehicle and associated carbon emissions. From a plan-making standpoint allocating further growth in this highly sustainable location would help achieve greater connect at both a regional and local level.

4. SUSTAINABLE GROWTH STRATEGY
Growth Strategy
4.1 RLDP Sustainable Growth Strategy comprises six key elements as follows:
1. Delivering a sustainable level of housing and employment growth supported by appropriate infrastructure that accords with the Vale's position within the Cardiff Capital Region (CCR).
4.2 In order to meet the overarching Vision, the Vale have identified a need to deliver at least 8,679 new dwellings over the proposed plan period which responds to the identified housing requirement of 7,890 homes (526 per annum) and incorporates a 10% flexible allowance. Barratt Redrow acknowledge the proposed approach, however, maintain it should be considered a minimum figure with aspirations to achieve greater levels of growth in sustainable locations across the district.
4.3 Whilst Barratt Redrow appreciate these figures are based on average completion rates over the first ten years of the adopted Local Development Plan, it is important to recognise that a higher rate of housing delivery is demonstrably achievable. Annual completion rates peaked at 917 dwellings, with six of the ten monitoring years exceeding the 526 per annum figure currently relied upon. This demonstrates that delivery capacity within the Vale has historically operated well above the proposed requirement and should therefore provide confidence that a higher housing target could realistically be achieved over the emerging plan period.
4.4 Furthermore, the Council's own evidence base (BP7 - Housing and Employment Growth Options) identifies a five-year average build rate of 780 units per annum between 2016 and 2021. Again, this figure exceeds the annual delivery rate currently proposed within the emerging RLDP and reinforces the fact that the proposed housing requirement should not be unduly constrained by a lower long-term average.
4.5 Whilst Paragraph 5.8 explains that the proposed figures are based on a ten-year average delivery rate, it fails to acknowledge that this period included the Covid-19 pandemic and at a time where construction costs experienced significant inflation. These factors had a material impact on the housebuilding industry nationally and inevitably suppressed delivery rates during those years. From an objective perspective, basing the future housing requirement on an average that includes these exceptional circumstances risks skewing the figures and underestimates the district's true delivery potential for the Vale.
4.6 In light of the above Barratt Redrow believe a sensible response would be to incorporate a greater flexible allowance of 15% within the RLDP to demonstrate an appropriate level of growth will be achieved. Whilst also ensuring there is sufficient supply of sites to come forward early on during the plan period to proactively address housing need from the point of adoption up to 2036.
4.7 From a procedural standpoint it is also important to note that the currently adopted plan predates the publication of

Future Wales: The National Plan 2040 and the Vale's position within a national growth area. As such, pursuing an approach which seeks to maintain historic delivery rates is not considered to reflect this enhanced role and arguably lacks the level ambition set out at a national level. The proposed housing requirement should therefore be uplifted to positively respond to such matters in order to ensure conformity with Future Wales and regional aspirations.
4.8 Increasing the overall housing target would also act as a catalyst to enhance the delivery of affordable housing which is identified as a key objective for the RLDP. Each proposed site allocation is subject to a policy-compliant percentage contribution, therefore a higher level of market housing would proportionately generate a greater number of affordable homes to meet local need across the region.
2. Aligning locations for new housing, employment, services and facilities to reduce the need to travel.
4.9 Barratt Redrow supports the Vale's objective to locate new major development in areas of the region best served by existing infrastructure and supporting services. The Settlement Appraisal Review (BP5) identifies Wenvoe as primary settlement in the region with suitable local services to accommodate future growth which remains in keeping with the overall function of the existing settlement.
4.10 Whilst the settlements of Barry, Penarth, Llantwit Major and Cowbridge are deemed to score higher on certain criteria it is clear that Wenvoe has a role and function providing both local key facilities and also acceptable linkages and distance to wider key and daily facilities.
3. Focusing development at locations that are well served by existing and proposed rail stations as part of the South Wales Metro and in areas with good bus links.
4.11 The Deposit RLDP explains that whilst reducing the need to travel is a key policy objective, it is recognised that there are journeys that will need to be made by other modes of transport, particularly due to the strong relationship with Cardiff as a designation for employment, retail and entertainment. As such the proposed growth strategy seeks to locate development in places that are inherently well served by sustainable transport in line with the Vale of Glamorgan's transport hierarchy.
4.12 Barratt Redrow supports these principles and recognises the importance of prioritising development in sustainable locations across the regions, particular those well connected to Cardiff city centre. Paragraph 5.18 of the Deposit Plan states that "Targeting new development to the settlements that are served by the rail network is a key part of the strategy, as it will facilitate journeys being made by means other than the car". Barratt Redrow consider that the rail network is an important way to facilitate journeys other than by car, however it is not the only option available and that other sustainable sites, such as Swn Y Coed, are also accessible by public transport – namely bus services.
4.13 Whilst Barratt Redrow support the principle of prioritising growth within the Council's sustainable transport corridor, it is important to recognise that there is not an infinite supply of land within close proximity to railway stations across the Vale of Glamorgan. Physical constraints, settlement patterns and environmental designations mean that the availability of suitable and deliverable sites within immediate walking distance of rail infrastructure is somewhat limited. Therefore, relying solely on these locations risks unnecessarily constraining the overall supply of land for housing and may limit the Council's ability to maintain a consistent supply of homes up to 2036.
4.14 In this context, Barratt Redrow believe the RLDP should be updated to also identify opportunities for growth in locations that are well served by the strategic bus network. From a procedural standpoint this approach would remain consistent with the overarching objective of a transport-orientated growth strategy, whilst recognising the wider role bus corridors can play in facilitating a sustainable pattern of development. The benefits of which would provide greater certainty that local housing needs can be met over the proposed plan period and in turn strengthen the council's ability to demonstrate the plan has been soundly prepared.
4.15 By directing development to locations well served by existing bus infrastructure, the proposal would help reduce the need for commuting via private vehicles, particularly for journeys to key employment and service destinations. In doing so, it would make a positive contribution towards the Council's climate change targets through the reduction of carbon emissions and promoting a modal shift within the local community.
4.16 In relation to Swn Y Coed, bus stops are conveniently located at Walston Castle and Station Road approximately 95m and 440m from the site off the A4050, providing regular services to Cardiff City and surrounding settlements.
4.17 Furthermore, to the north of the site Culverhouse Cross is easily accessed by cycling, walking or via bus routes which can be caught just 100m east of the site. Culverhouse Cross Retail Park has an extensive range of facilities and employment opportunities that are within 2km of the site (easy walking and cycling distance).
4.18 Overall, it is considered that the site is in a relatively sustainable location and is within easy walking distance of public transport and Wenvoe village centre, which provides some basic facilities approximately 600m south of the site. For the reasons set out above, the site is considered to offer an opportunity for residential development in a suitable location that would facilitate and encourage sustainable travel, with no major highway related concerns.
4.19 Focussing further growth in well-connected, sustainable locations such Wenvoe will therefore support the Council's transport-led placemaking approach. These principles fully align with the Welsh Governments strategic objectives as set out within the Future Wales – the National Plan 2040, Planning Policy Wales Edition 12 and Llwybr Newydd: The Wales Transport Strategy, which in turn shall contribute towards achieving a more sustainable pattern of development within the RLDP.

5. POLICY FRAMEWORK
5.1 Section 6 of the Deposit Plan outlines the policy framework for delivering the plan, including both Strategic and Development Management Policies following revisions pursuant to the Preferred Strategy consultation.
5.2 The Deposit Plan has arranged these policies into the four themes of Planning Policy Wales as follows:
• Strategic and Spatial Choices
• Active and Social Places
• Productive and Enterprising Places
• Distinctive and Natural Places

5.3 Whilst some of the technical details overlap, each of the policies considered to be of relevance are discussed in further detail below.
Policy SP1 – Sustainable Growth Strategy (& Policy SP6 – Housing Requirements)

5.4 This policy states that in order to deliver the Sustainable Growth Strategy for the Vale, the emerging RLDP will make provision for 7,890 dwellings and 5,338 jobs over the plan period. In order to achieve the former Policy SP6 explains that to meet the identified housing requirement of 7,890 dwellings, provision will be made for the delivery of 8,660 homes in the Plan Period 2021 to 2036 which incorporates a 10% flexible allowance. In turn this will be distributed as follows: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.
5.5 Barratt Redrow acknowledge the Council's conclusion that in principle the 'Medium' growth option reflected in Policy SP1 generally accords with the Welsh Government's aspirations for the Vale of Glamorgan within the Future Wales national growth area, which is identified as a focus for strategic economic and housing growth. Given the Vale forms part of the Cardiff Capital Region, it is equally important that the overall level of growth remains suitably ambitious to support the region's economic aspirations and continues to complement Cardiff which remains the nearest neighbouring authority.
5.6 Although we understand the proposed approach uses the Dwelling-led 10 Year scenario, which is based on the average annual build rate for the first 10 years of the adopted plan and equates to a total of 7,890 new homes or 526 dwellings per annum over the emerging plan period. The overarching intention is to ensure the projected level of growth is deliverable whilst recognising the fact there is sufficient capacity within the Vale to support further growth towards the higher end of the 'medium' range.
5.7 As noted, Barratt Redrow are wholly in support of providing additional sites, such as Swn Y Coed, Wenvoe, which would provide a logical extension to the defined urban area of Wenvoe and which will facilitate the delivery of much needed full market and affordable housing to help address the significant level of demand identified across the Vale.
5.8 Swn Y Coed is promoted in the context of the concerns raised regarding the current figure of 8,660 new dwellings which is underpinned by a 10% flexible allowance in relation to housing delivery. Barratt Redrow consider it relevant to take account of recent evidence provided to other Local Planning Authorities in Wales which have either adopted or are in the latter stages of bringing forward a new Local Development Plan.
5.9 For example, in Bridgend the Council recently adopted their new Local Development Plan (covering the period 2018 to 2033) which is underpinned by a flexibility allowance of 14% equating to an additional 1,053 dwellings. This level of provision was required in order to demonstrate the Anticipated Annual Build Rate (AABR) were deliverable and ensure that the Plan remains effective in the event of changing circumstances. During the examination process the Inspector explained that an increase beyond the standard 10% was fundamental to enable the plan and its housing trajectory to be resilient and sufficiently adaptable. The overarching purpose of which is to account for any unforeseen changes and potential shortfalls/ delays to the strategic site allocations whilst still enabling the overall housing requirement to be delivered.
5.10 For Swansea, the Council published their LDP2 Pre-Deposit Plan (Preferred Strategy) for consultation last year. In terms of housing delivery this incorporates a 20% flexible allowance above the proposed housing requirement and is predicated on the basis of needing to account for certain sites not coming forward as anticipated and other unforeseen factors affecting delivery. Similar to the Vale, Swansea City Council's latest Annual Monitoring Report (6th Edition) (October 2025) confirms that since adoption of the current LDP in February 2019 they have not met their annual housing target for any of the past six years. To date this has resulted in a shortfall of approximately 3,767 homes which is predominantly attributed to delays associated with larger strategic allocations. Therefore, in order to avoid having similar implications next time around the Council have uplifted the proposed flexible allowance within LDP2 and intend to incorporate a more diverse portfolio of sites going forward. The main purpose of which is to build in an additional margin of flexibility above the standard 10% threshold and therefore enable other sites to come forward to account for potential slippage elsewhere to ensure the plan is effective in meeting local need.
5.11 More recently in Monmouthshire, the Council submitted their proposed RLDP to PEDW in November 2025. As part of which they have identified a requirement of 6,210 homes which incorporates a 15% flexible allowance. Similar to above an increase beyond the standard 10% threshold has been justified to account for potential shortfalls/ delays due to longer lead in times needed for strategic site allocations whilst proactively addressing any historic unmet need.
5.12 Whilst Barratt Redrow appreciate that the Council intends to prioritise growth towards the higher end of the 'medium' range, having reviewed the Deposit Plan evidence base Barratt Redrow believe a minimum allowance of 15% would be more reflective of the Vale's strategic position and would seek an additional 395 dwellings to the medium growth option equating to a total of 9,074 homes. The benefits of which are evident above and justification well-established from a plan-making perspective to ensure the RLDP is underpinned by a robust evidence base which incorporates a suitable level of flexibility to effectively meet local housing need from the outset.
5.13 In addition to the above the importance of increasing the RLDP's housing target, by virtue of uplifting the proposed flexible allowance, has recently been highlighted by the findings of data published by the Welsh Government (WG). Most notably that includes the 2022-based Local authority household projections (Dated 20th November 2025) and 2025-based estimates of additional housing need (Dated 12th February 2026).
5.14 Upon publishing the former superseded the previous 2018-based demographic projections and provides updated figures from mid-2022 to mid-2032. The results show that whilst the overall number of households in Wales is projected to increase by around 98,500/ 7.2%, to a total of 1.46 million. The local authorities projected to see the largest percentage increases are the Vale of Glamorgan (up 11.7%) and Cardiff (up 11.1%).
5.15 In turn these trends are carried through into WG's 2025-based estimates of additional housing need, which identifies an existing unmet need of 9,400 homes. This is supplemented by a requirement to deliver an average of 8,700 new homes annually over the next five years to account for newly arising need alone. The combination of which

demonstrates that there is an urgent need to increase delivery rates on both a national and local level, and therefore it's imperative that the latest position with regards to the need for affordable and full market homes are accurately reflected within the Council's housing figures.

5.16 In terms of considering the level of housing provision for a plan, Paragraph 5.34 of the DPM is explicit in that the most up-to date suite of Welsh Government Population and Household Projections must form the foundation of any evidence base. LPAs are then required to use a household conversion factor when translating households to dwellings to establish overall need. Once again, the DPM explains that failure to include a robust conversion rate from the outset is a high-risk strategy and may undermine the overall soundness of any emerging plan. To avoid such circumstances, we believe it's essential the LMNA is updated to reflect the latest WG datasets, which in turn is likely to provide grounds to warrant extending the proposed 15% threshold further. Ultimately this approach intends to ensure the emerging RLDP more effectively meet local need over the entire plan period and thus soundly prepared.

5.17 As mentioned above, Policy SP6 provides a high-level breakdown of how the Council's housing growth is expected to be delivered over the plan period. For completeness this includes: i) 3,837 dwellings from the existing land supply; ii) 3,520 dwellings on allocated sites; & iii) 1,303 dwellings from large and small windfall developments.

5.18 Whilst we do not dispute those relating to proposed site allocations and/ or windfall developments. The proportion of dwellings set to be accounted for within the Vale of Glamorgan's existing landbank (3,837 units) is considered excessive given it represents 44.3% of the Council's overall housing requirement.

5.19 Although Barratt Redrow acknowledge that this is partly derived on the basis that emerging plan period has technically already commenced (2021 to 2036) and therefore is made up of

Figure 2. Extract of the Welsh Government's Calculation Method for Total Dwellings as per the Development Plan Manual Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

sites at various different stages of planning process (i.e. either already built out, being constructed or secured consent - as shown below). It is important to recognise the potential implications this approach has in terms of stifling opportunities for growth, which is contrary to the Welsh Government's aspirations for the Vale of Glamorgan as part of a National Growth Area within Future Wales: The National Plan 2040.

5.20 From an objective standpoint this means there is only a need for 2,561 additional dwellings (3,520 dwellings minus 959 units rolled forward) to be delivered from new allocations over the emerging plan period. This reinforces the point that in reality the overall quantum of new homes will be significantly lower than the figure set out within the RLDP's vision and strategic objectives. In turn this prevent opportunities for new sites to come forward as part of the plan-making process and in doing so hinder the Council's ability to account for historic unmet need. Collectively this substantiates Barratt Redrow's position that in order for the plan to be considered sound the Council must accommodate a greater flexible allowance, optimising sites such as Swn Y Coed, Wenvoe, to ensure the emerging local plan complies with the Welsh Government's aspirations set out within Future Wales.

5.21 As illustrated above, the Council anticipate 1,303 dwellings coming forward in the form of windfall sites. This accounts for both small and large sites which in turn represents around 15% of the Council's overall housing requirement. Once again, whilst we do not contest the overall windfall provision or the projected delivery rate of 87 dwellings per annum up to 2036. It is important to recognise that based on past trends the annual number of homes which comes forward on windfall sites varies significantly year on year.

5.22 Table 18 of the Development Plan Manual is explicit in that respect and explains that although due regard must be attributed to analysis of past delivery rates, periods of abnormally high or low completions should be considered inappropriate/anomalies when extrapolating future rates of windfall sites. On that basis ensuring the RLDP incorporates a greater flexible allowance will not only provide certainty that any shortfalls/fallow periods are offset but also enable a more consistent supply of homes to be achieved over the plan period as a whole.

5.23 Lastly, in terms of overall growth Paragraph 5.8 of the Deposit Plan states that the level of growth they have identified ''has been demonstrated to be deliverable and is sufficiently ambitious to reflect the Vale's position in the Future Wales national growth area.'' It also notes that this level of growth has been chosen so that it is ''complementary to, rather than competing with, the neighbouring authority of Cardiff and the wider Cardiff Capital Region (CCR).''.

5.24 Whilst it is agreed that the level of growth may be realistic based on past trends, the claim that this is sufficiently ambitious and needs to be at this level to avoid competing with Cardiff is not substantiated by evidence to suggest that a higher level of growth could not also achieve these principles.

5.25 Cardiff, as the capital city of Wales, also demonstrated historic under delivery when publishing its deposit plan for consultation in February 2025, which was the case for allocated sites as well as generally for annual delivery rates over the adopted plan period. This resulted in a failure to meet targets over the last 10 years of their adopted plan. Whilst Cardiff has made progress in more recent years, the latest Annual Monitoring Report published in October 2025 notes that to date the region has met just 58% of its overall dwelling requirements over the plan period from 2006-2025.

5.26 Accordingly, with Cardiff opting to continue with a medium growth option for their RLDP despite these shortfalls, there is no sound basis to suggest that adopting a higher growth level within the Vale would detrimentally impact upon housing delivery or 'compete' with Cardiff.

5.27 In summary, Barratt Redrow acknowledge the overall medium growth strategy, however given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, Barratt Redrow maintain that the proposed RLDP should be more ambitious when it comes to housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.

5.28 These steps would help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Overall, we conclude that a higher flexibility allowance and additional site allocations, such as Swn Y Coed, Wenvoe, are necessary to ensure the RLDP is able to effectively meet local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.

Policy SP2 – Settlement Hierarchy

5.29 Policy SP2 highlights that development will be focused with the Strategic Growth Area and that its distribution will be shaped by settlement hierarchy and seeks to direct 'growth to locations that will provide the greatest opportunities for delivering housing to meet affordable needs, community infrastructure and enhanced sustainable transport provision'.

5.30 Accordingly, despite Wenvoe being identified as a primary settlement, Policy SP2 notes that development in this location will be limited to 'the efficient and sustainable use of existing buildings, infill opportunities, small-scale affordable housing led schemes, and rural enterprise/ agricultural related developments.' Similarly, it is noted that Policy SP2 does not consider Wenvoe to be an appropriate location for ''substantial additional growth''.

5.31 Barratt Redrow object to the approach to Primary Settlements as set out under this Policy, as Wenvoe is inherently sustainable and the explanation for discounting it as an area to accommodate growth is considered unjustified.

5.32 First of all, the Deposit Plan acknowledges that it performs a similar function to the Primary Settlements located within the Strategic Growth Area and it is described as one of the 'sustainable communities' in The Vale of Glamorgan Key Characteristics section, as noted previously in Section 3.

5.33 Likewise, the site benefits from excellent accessibility the local public transport network, active travel routes and local services. These characteristics fully accord with Welsh Government's strategic objectives and emphasise the fact that Swn Y Coed constitutes an appropriate location for future housing.

5.34 With regard to Policy SP2 discounting Wenvoe as a location to accommodate growth, this is due to the Vales's stance that the settlement is ''significantly limited by the presence of Best and Most Versatile (BMV) agricultural land on the edge''. Barratt Redrow do not consider this to be sufficient justification to discount the site from allocation as there would be limited impact on BMW agricultural land arising from the development of Swn Y Coed.

5.35 For example, as set out in the ALC report prepared by Kernon CCL and provided as part of the Candidate Submission Ref 437, the highest grade on site would be Subgrade 3a, with the site comprising a mix of Subgrades 3a and 3b. This means that in National Policy terms, development of the site would be in accordance with paragraph 3.59 of PPW 12 as the lowest grade available.

5.36 Furthermore, any perceived harm in terms of agricultural land is not considered to outweigh the benefits brought by the development in terms of contributing to both affordable and market housing need over the plan period, not least given the historic shortfalls identified earlier in this submission.

Policy SP4 - Placemaking

5.37 Policy SP4 is recognised as a key Policy in the emerging RLDP to ensure that new proposals align with existing communities and placemaking principles across the county.

5.38 Policy SP4 also requires all major development to provide a 'Placemaking Statement'. It should be made clear in the Policy, as per Paragraph 6.34 of the Deposit Plan, that this is not expected to be a standalone statement, but will form part of a Design and Access Statement. We recommend the policy is amended as follows:

5.39 Nonetheless, the development of Swn Y Coed is considered to coincide with the objectives of Policy SP4, where the illustrative masterplan submitted as part of previous representations demonstrates its capability to deliver a range of housing types and tenures, whilst integrating key green infrastructure features.

5.40 Local services and facilities are also accessible from this location, tying in with criteria 7, and supports public transport use (as per criteria 4) given the close proximity to a frequent bus route.

5.41 Likewise, the quantum of units proposed demonstrates efficient use of the land based on the net developable area and site constraints in line with emerging Polic PGD2.

5.42 In principle Barratt Redrow supports Policy SP4 and the aim of ensuring all new development is of high-quality sustainable design.

Policy PGD1 – Creating Well Designed and Inclusive Places

5.43 Barratt Redrow question the need for both Policies SP4 and PGD1 as there is repetition. In principle the criteria as set out is as to be expected, however there is a need to recognise that not all criteria can always be accommodated on development sites. There are other environmental and economic factors need to be considered. However, if Policy PGD1 remains, then the text needs to be updated to suggest a site by site basis rather than the current blanket approach suggested.

Policy PGD2 – Residential Development Densities

5.44 Residential densities are supported as a principle, however, should not be so prescriptive as to unnecessarily restrict development. Policy PGD2 outlines that residential development over 0.5ha will be permitted where the residential density is a minimum of 35 dwellings per net hectare within Key, Service Centre and Primary Settlements and 30 dwellings per net hectare in Minor Rural Settlements.

5.45 A minor point in relation to the policy wording is the 'dwellings per net hectare' and the removal of non-developable space in any calculations. Whilst this is normal, the increased requirements relating to SAB, green infrastructure requirements and increased ecological mitigation all have a direct impact on the remaining available land and it is positive to see there is an allowance for some flexibility.

5.46 The density requirement appears to be reasonable in approach, and the flexibility to allow individual site

adjustments (as per the remaining text within the Policy) is supported. There will be occasions where the density will need to be considered due to other on-site factors.
5.47 Policy SP5 is supported in principle insofar as it seeks to promote healthier and more inclusive places, consistent with the objectives of Planning Policy Wales and the Well-being of Future Generations (Wales) Act 2015. However, to ensure the policy is robust and effective, it is important that it is supported by an up-to-date and clearly evidenced policy framework. In this regard, the supporting evidence base, particularly BP36 – Planning Healthy Places (June 2024), should be reviewed to ensure that the datasets referenced reflect the most recent available information. For example, life expectancy data currently cited (2018–2020) and indicators based on the Welsh Index of Multiple Deprivation 2019 should be updated where possible to reflect the most recent datasets, including the Welsh Index of Multiple Deprivation 2025 and any updated public health, active travel, air quality and demographic data. Ensuring that the evidence base reflects the latest available information is necessary to demonstrate that the policy is justified and based on an accurate understanding of local health conditions and inequalities.
5.48 The policy framework should also be updated to reflect the Health Impact Assessment (Wales) Regulations 2025, which were approved by the Senedd in November 2025 and will come into force on 6 April 2027. At present, these forthcoming statutory requirements are not referenced within Policy SP5 or the supporting guidance. Given that the regulations will establish a statutory framework for the preparation of Health Impact Assessments in Wales, it will be important for the RLDP and supporting documents to clarify how the policy's screening, checklist and Rapid HIA requirements will interact with the statutory regime once implemented. Including reference to the regulations would help ensure that the policy remains aligned with national legislation and is future-proofed over the plan period.
5.49 The supporting Rapid Participatory HIA of the Deposit RLDP (BP3, September 2025) provides useful background regarding the Council's engagement with stakeholders in preparing the plan. However, it would be beneficial for the Council to clearly explain how the findings of that work have informed the specific requirements contained within Policy SP5. Providing a clearer link between the outcomes of the participatory HIA and the policy approach adopted in the RLDP would improve transparency and demonstrate that the policy has been shaped by the evidence gathered through the stakeholder engagement process.

Policy SP5 - Creating Healthy and Inclusive Places and Spaces

5.50 The emerging Health Placemaking Supplementary Planning Guidance (SPG) is broadly welcomed as a practical tool to support implementation of the policy. Nevertheless, a number of matters require further clarification prior to its adoption. In particular, whilst the SPG provides greater clarity regarding the use of the Healthy Placemaking Checklist and Rapid HIAs, it does not clearly identify the circumstances in which a comprehensive (full) HIA would be required. The SPG should also be updated to reflect forthcoming guidance from the Welsh Health Impact Assessment Support Unit (WHIASU) expected in 2026, and ensure alignment with other relevant policies and guidance, including those relating to design, travel plans, public transport accessibility and open space provision. Given the number of cross-references within the SPG, it will be important that these documents are fully aligned and consistent.
5.51 Finally, any requirement for a Health Impact Assessment should be applied on a proportionate basis, reflecting the scale, nature and likely impacts of the development proposed. The policy should therefore make clear that the scope and level of detail required for HIAs will be proportionate to the scale and type of development. Subject to these amendments and clarifications, the policy would provide a clearer and more effective framework for integrating health considerations into the planning process.
5.52 Please refer to Policy SP1 as written response also accounts for information proposed under this particular policy.

Policy SP6 – Housing Requirements
Policy HG1 – Housing Allocations
Policy HG1 (B) – Housing Allocations
• HG1 (3) Barry - Land at Hayes Lane 5.53 Barratt Redrow question the suitability of allocating residential development on the site known as Land at Hayes Lane, The Bendricks. These concerns are centred on the following:
• 5.54 Whilst the site is technically identified within the settlement boundary, it is clearly not a sustainable location for residential development. This is evident by virtue of the fact that Land at Hayes Lane is situated within an existing industrial estate and lacks any supporting facilities. The former reinforces the principle that as a whole the area is characterised by a mix of light industrial and heavy industrial uses which naturally conflicts with the prospect of future residential housing. Moreover, it is reasonable to assume vehicles using the local highway network will be larger in nature (such as HGV's) and given the majority of streets do not contain dedicated pedestrian footpaths/ cycleways, this raises concerns from a highway safety perspective.
• 5.55 Although we note the Transport Statement from AECOM suggests access can theoretically be achieved to Barry and Sully. Both of these settlements remain over 2km from the site and lie outside of the distances deemed acceptable by Transport for Wales (TfW) to support resident development.
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• 5.56 Allocating housing on Land at Hayes Lane which therefore does not comply with such criteria would clearly

undermine the Council's objective of pursuing a Transport Orientated Growth approach and by virtue of which risk promoting an unsustainable pattern of development within the emerging RLDP.
• 5.57 As outlined above given the nature of the area there are almost no existing active travel routes in this part of the region. This lack of provision would ultimately lead to future residents using alterative options and many of which would require residents to overcome physical barriers in order to travel in a more sustainable manner. For instance, due to the level of infrastructure associated with the port, the site is effectively detached from the main urban area of Barry and would involve crossing an active railway line halfway along Wimborne Road without sufficient mitigation measures in place. On the other hand, whilst Hayes Road extends further west towards Sully, it follows the southern boundary of the Polaris Industrial Estate which contains various access points that are in regular use throughout the day. Collectively these characteristics would prevent future occupants travelling in a more active manner which is in direct conflict with both local and national planning policy objectives.
• 5.58 The site's geographic isolation means that access to modes of public transport are extremely limited. Most notably that includes railway stations with the nearest being Cadoxton Station which is located circa 3.8km north of the site. By AECOM's own accord this is considered to equate to a minimum walking distance of 52 minutes which exceeds TFW's standards for residential development. Again, this reinforces the fact future residents would be overly reliant on private vehicles to access local services (such as employment opportunities, schools, doctor surgeries etc) which in turn shall achieve an unsustainable pattern of growth and increase associated carbon emissions.
• 5.59 Crucially, the site remains allocated in the adopted LDP for B1/B8 employment uses. These intended to facilitate small industrial and workshop units as part of the Atlantic Trading Estate's expansion and in turn support opportunities for local businesses/ enterprise ventures. The council's latest Employment Land Review confirms a clear demand for such uses in Barry, with Land at Hayes Lane representing the most logical location for further growth. Reallocating this land for housing would therefore diminish the Vale of Glamorgan's ability to attract sufficient economic investment to support the requisite levels of growth over the emerging plan period, and potentially displace businesses to other less suitable parts of the region which would not be in the interests of good placemaking as per PPW12.
• 5.60 Although the RLDP's evidence base suggests there are other development opportunities within the region that could compensate for the proposed loss of employment land. Upon further review it is apparent these are in less favourable locations from both a strategic and operational standpoint. Reassigning Land at Hayes Lane from employment to residential would therefore undermine the Council's objective of safeguarding existing employment land and prioritising business/ industrial uses in area's well served by infrastructure designed to accommodate such activities (such as Barry Docks). Furthermore, it would also set a precedent for other potential losses and in doing so impact the Council's ability to meet the region's employment needs up to 2036.
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Loss of Allocated Employment Land Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.61 By virtue of the above, Barratt Redrow object to the proposed allocation of residential development on Land at Hayes Lane. The principle of which is in direct conflict with the Welsh Government's objectives set out within PPW12 & Future Wales: The National Plan 2040 and the need to ensure existing employment land is suitably protected. The latter is crucial in attracting future investment to the region and shall act as a catalyst to enable housing to be delivered elsewhere, in more sustainable locations better connected to local services/ facilities, such as Wenvoe.
• 5.62 Whilst we do not oppose the overall principle of residential development at Site C (Central Parcel), this position must be considered in the context of the wider allocation. Applications for Sites A and B (2020/00351/OUT (Site A) & 2020/00352/OUT (Site B)) are currently pending subject to respective Section 106 Agreements, with prolonged negotiations resulting in significant delays to delivery. This experience clearly demonstrates that development within this allocation is complex and subject to extended viability and legal discussions, which inevitably impacts the rate at housing is able to come forward.
• 5.63 According to the Council's register we understand Site C has not been subject to any formal planning application, and therefore there is no detailed evidence available regarding the proposed layout design, infrastructure requirements, viability, or anticipated submission and determination timeframes. Despite this, the Council's housing trajectory assumes development commencing in 2028/29, with 35 units initially and 45 units annually thereafter. Given the absence of a live application and the precedent of delays on Sites A and B, these delivery assumptions appear overly optimistic based on current evidence.
• 5.64 On that basis we maintain that the Council should reassess the trajectory assumptions for this particular site and identify other alternatives to help account for any unforeseen slippage on Site C. The provision of Swn Y Coed, Wenvoe represents an ideal opportunity to absorb the fallout in terms of housing numbers whilst ensuring the RLDP incorporates sufficient flexibility to consistently meet housing need over the entire plan period.
• 5.65 Although we do not necessarily dispute this sites progression, given Wates have submitted a full planning application (Ref 2024/01152/FUL) which is currently under consideration.
• 5.66 It is important to recognise that, according to the Council's online planning register, two substantive consultation concerns remain outstanding. Firstly, the Highways response raises fundamental layout issues; and secondly, the Ecology department maintains a holding objection on the basis of insufficient supporting evidence. To date we understand both matters remain unresolved and may well require extensive design amendments, additional technical work, and potentially further consultation before the application can ultimately be determined.
• 5.67 In the absence of confirmed solutions to these issues, there remains uncertainty regarding the timeframe for determining the planning permission. Furthermore, even if consent is secured, there will be a need to discharge conditions and address any pre-commencement requirements, which will inevitably impact the lead-in time before development gets underway.

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• HG1 (5) Llantwit Major - Land between the Northern Access Road and Eglwys Brewis Road (Site C – Central Parcel)
• HG1 (7) St Athan - Former Stadium Site, adjacent to Burley Place
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• 5.68 Given these outstanding matters, the assumption that development will commence in 2027/28 appears optimistic at this stage. Delivery timescales may be extended depending on the scale of amendments required and the duration of condition discharge processes. With this in mind, we believe it is prudent for the emerging RLDP to identify a broader and more diverse portfolio of site allocations to support housing delivery earlier on in the plan period. Ensuring flexibility through additional deliverable sites (such as Swn Y Coed) will reduce the Council's overreliance on sites such as this one and provide greater certainty in maintaining a more consistent supply of homes over the plan period irrespective of potential delays that may arise on this site.
• 5.69 Whilst we understand that the proposed developer, Edenstone Homes, has recently engaged with the Council through its pre-application service. According to the Council's planning register, no formal planning application has been submitted to date. As such, there remains no confirmed development proposal, agreed technical evidence base, or indicative determination timeframe associated with the allocation.
• 5.70 In the absence of a live application, there is a considerable degree of uncertainty surrounding the anticipated delivery programme. The housing trajectory assumes development commencing in 2027/28; however, this appears optimistic given that an application has yet to be submitted, validated or determined. Even following any grant of planning permission, there would be a requirement to discharge pre-commencement conditions and satisfy any relevant planning obligations before development could lawfully begin. From experience these processes can be time-consuming and may result in significant delays with regards to lead-in times prior to first completions.
• 5.71 Given this uncertainty, reliance on the site to deliver within the early phases of the plan period carries risk. It is therefore important that the emerging RLDP identifies a broader and more diverse portfolio of deliverable site allocations to support housing delivery, particularly in the earlier years of the plan. Incorporating additional sites with stronger prospects of short-term delivery will provide flexibility, resilience, and greater confidence in maintaining a robust housing land supply should delays arise on this allocation.
• 5.72 Barratt Redrow acknowledges the Council's position in respect of Site HG3 (1) – Former Eagleswell Primary School, including the temporary five-year consent (2024–2029) for 90 units of short-term accommodation and their inclusion within housing completions for monitoring purposes.
• 5.73 Given their expressly temporary nature and planned relocation to other sites within the Vale by 2029, it is essential that these units are not double counted in a way. As the risk of doing so would artificially inflate the Vale's housing numbers, thereby preventing delivery opportunities elsewhere over the plan period.
• 5.74 Although Barratt Redrow welcome the clarification provided at paragraph 6.111 which states that once the temporary units are removed and the site is redeveloped for permanent accommodation, any future dwellings will not be included within the RLDPs housing supply
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• HG1 (8) St Athan - Clive Road, St Athan

Policy HG3 – Housing Led Redevelopment Opportunity Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• figures. In the interest of soundness, we believe this should explicitly set out within the proposed wording of Policy HG3 to avoid any potential ambiguity and thus ensure no additional net housing contributions will arise from the site upon its redevelopment later down the line.
• 5.75 This approach is critical given the Vale's substantial existing landbank and the number of allocations being rolled forward, as cumulatively factoring in additional units from this site would further constrain opportunities to accommodate genuine growth elsewhere. Thereby limiting the Council's ability to effectively meet local housing need up to 2036.
• 5.76 In principle, Barratt Redrow support Policy SP7's objective to secure a minimum of 3,070 affordable homes over the plan period. That said, given the level of affordable housing is directly proportionate to the total housing provision within RLDP we believe there is scope for further uplifts in that respect.
• 5.77 As mentioned above Barratt Redrow maintain that there is sufficient evidence to justify increasing the proposed housing requirements through the Vale's flexibility allowance in order to maximise opportunities for growth. In turn this would prevent artificially capping affordable housing provision at 3,070 homes to ensure the plan is positively prepared by incorporating measures that proactively address demand across the region.
• 5.78 National policy clearly supports this approach. Planning Policy Wales requires development plans to be positively prepared and to maximise the delivery of affordable housing as a key component of sustainable placemaking. The Development Plan Manual reinforces the need for plans to be aspirational, evidence-led and sufficiently flexible to ensure delivery. Furthermore, the Welsh Government 2025-based estimates of additional housing need report highlights the need for a step change in affordable housing delivery across Wales, recognising that continuation of past trends will not address the current affordability challenges. Collectively, this provides a clear direction of travel in that it's imperative to uplift housing provision where affordability pressures are acute such as the Vale of Glamorgan.
• 5.79 To ensure the RLDP is sound, the Council should increase the overall housing requirement by apply a meaningful

flexibility allowance that ensure sufficient contingency measures are in place to consistently meet local need over the plan period. This would directly increase the quantum of affordable housing secured through policy mechanisms, thereby aligning the Plan with national policy objectives. The latter goes to the heart of the tests of soundness within the Development Plan Manual in ensuring the plan is not only appropriate but capable of delivering the step change required to address affordable housing needs up to 2036.
• 5.80 Similarly, it is considered that Policy SP7 should be updated to allow flexibility and avoid the risk of contradicting Policy SP8. At present the blanket approach to affordable provision does not allow for site-specific delivery or viability requirements which may arise and as such, the amplification text should also include a note similar to the following:
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Policy SP7 – Affordable Housing Provision
'Where the target affordable housing percentage is considered unviable due to physical, financial, or other constraints, sites will be reviewed on an individual basis following submission of a detailed viability assessment and any supporting evidence as necessary'. Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.81 Barratt Redrow supports the position that residential development should help meet affordable housing need. Although to ensure Policy SP8 is effective its important the percentage requirements and site thresholds proposed must be viable across a range of site types and market areas to ensure they do not inadvertently suppress delivery.
• 5.82 On that basis we believe it would be prudent for the Deposit Plan to clarify that affordable housing targets are subject to site-specific viability considerations and can be adjusted in circumstances where comply with such parameters would render the sites viable and thus prevent delivery. Greater flexibility is also needed in tenure and mix to better reflect evolving local needs over the entire plan period including the point when planning applications are formally submitted. This would help ensure that the approach is consistent with paragraph 4.2.32 of PPW 12 which suggests that 'site specific targets are indicative affordable housing targets which should be established for each residential site…'.
• 5.83 As noted above, the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities that many sites could face, nor viability considerations which may affect delivery, particularly early on in the plan period. As such, re-wording of the policy text to allow for sites to be reviewed on an individual basis where such circumstances apply is considered necessary for soundness.
• 5.84 Barratt Redrow support the overall objective of Policy SP10 in seeking to promote sustainable transport, increase active travel opportunities and reduce reliance on the private car in accordance with national placemaking objectives. Encouraging development in accessible locations such as Wenvoe and enhancing connectivity between settlements is welcomed. However, for soundness its important the policy recognises the different physical characteristics across the Vale of Glamorgan, particularly in edge-of-settlement and rural contexts where flexibility is necessary to ensure sustainable growth is not unduly constrained.
• 5.85 In this regard, the Swn Y Coed, Wenvoe site (Ref 437) represents a sustainable and deliverable opportunity that aligns fully with the objectives of Policy SP10.
• 5.86 The Candidate Site submission was accompanied by a Technical Note prepared by Lime Transport. Seen as the site abuts the defined urban area of Wenvoe it represents a logical extension to the existing settlement and is well served by a range of local amenities and public transport. In terms of the latter the nearest bus stop is located within 100 meters of the site whilst the majority of local amenities are situated within 1.2 kilometres walking distance. Together these factors naturally promote the principle of linked trips which fully accords with the Chartered Institution of Highways and Transportations (CIHT) guidelines and reinforces the fact the site is a sustainable location for residential development.
• 5.87 As shown within the latest illustrative masterplan the proposed site will be served by a new junction off Old Port Road. This is confirmed as being the most appropriate arrangement from a highway safety perspective and would be supported by other technical analysis to demonstrate that sufficient visibility can be achieved on to the road for all potential users.
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Policy SP8 – Affordable Housing Requirements
Policy SP10 – Sustainable Transport Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.88 The accompanying Transport Assessment also demonstrates that there is sufficient capacity within the local highway network to accommodate the projected level of demand associated with this level of development. Where necessary, any future scheme would also facilitate other improvements which may well include widening the highway along Old Port Road and/ or Walston Road to accommodate two-way traffic and providing a dedicated pedestrian/ cycle junction to connect on to the existing active travel route which leads into the centre of Wenvoe. The existing field access would also be blocked up to create a more cohesive layout. However as shown within the latest masterplan the existing public right of way which crosses the site shall be retained and enhanced to promote better pedestrian connectivity throughout the local area.
• 5.89 In terms of active travel, dedicated pedestrian footpaths and cycleways will be incorporated throughout the scheme before filtering into the surrounding area. The site is also situated within an area which benefits from good access on to existing active travel routes and a number of which have also been identified for further improvements which reinforces the schemes sustainability. These principles fully accord with the relevant placemaking objectives set out within the National Plan 2040 and PPW12, and demonstrates that safe and suitable access can be achieved for all

users.
• 5.90 Subject to proportionate application of Policy SP10 and recognition of the robust mitigation proposed, the site clearly supports and advances the sustainable transport objectives of the emerging RLDP.
• 5.91 Barratt Redrow object to Policy CC1 on the basis that it duplicates and potentially exceeds Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework. Introducing a separate and more onerous operational net zero requirement at the local level risks imposing additional cost and complexity that undermines site viability and deliverability. The Development Plans Manual for Wales is clear that development plans must avoid repeating national policy and should not introduce requirements that are more appropriately addressed through other regulatory regimes. In this respect, Policy CC1 conflicts with the principle that plans should be clear, proportionate and not duplicate national controls, raising concerns under the tests of soundness relating to coherence and consistency with national policy (Test 2) and whether the plan is justified (Test 3).
• 5.92 The proposed step change in standards from 1 April 2030 — particularly the reduction in space heating demand from 40 kWh/m²/year to 15 kWh/m²/year — represents a significant and abrupt escalation in performance expectations. Whilst reference is made to initiatives such as Tai ar y Cyd and AECB CarbonLite, these have largely been associated with grant-funded affordable housing schemes. There is no clear evidence that equivalent standards can be viably delivered across mainstream private housing schemes without public subsidy. The Development Plans Manual requires policies to be underpinned by robust evidence and deliverable over the plan period. In the absence of clear viability evidence across different site typologies and market conditions, the policy fails to demonstrate that it is justified and effective (Tests 3 and 4).
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Policy CC1 - Residential Operational Net Zero Carbon Development Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.93 Policy CC1 also risks creating fragmented energy performance standards across different Local Planning Authorities in Wales. This undermines the benefit of a consistent national approach through Building Regulations and makes it more difficult for volume housebuilders operating across multiple authority areas to deliver homes efficiently at scale. The Manual emphasises that development plans should facilitate delivery and avoid unnecessary complexity. By introducing bespoke operational monitoring requirements, energy modelling thresholds and potential financial offset mechanisms, the policy blurs the boundary between planning and Building Control functions. This raises concerns as to whether the policy is effective and capable of consistent implementation (Test 4).Finally, the Council's own Viability Assessment (BP42, paragraph 6.60) acknowledges uncertainty pending Welsh Government's consultation outcome and suggests that, if national regulation progresses, it may be more appropriate for such matters to be addressed through Building Control rather than planning policy. This reinforces the concern that Policy CC1 is premature and may quickly become misaligned with national policy. As drafted, the policy risks undermining housing supply, affordable housing delivery and overall plan implementation. For these reasons, it fails to satisfy the tests of soundness in respect of coherence with national policy, justification and effectiveness, and should be deleted or fundamentally amended to align fully with the national regulatory framework.
• 5.94 Alternatively, if Policy CC1 is kept in the RLDP, there must be some flexibility introduced for the requirements of Policy CC1 to fall away should Building Regulations catch up or exceed or require different provisions than the requirements of Policy CC1 during the lifetime of the RLDP. To not provide this flexibility would mean that the ability of the RLDP to deliver the new homes in VoG needs could be compromised. Clarification is also required on how the contribution to the Council's Project Zero fund is to be calculated and whether the timeframes in Policy CC1 relate to the date of planning approval.
• 5.95 Furthermore, the demands of Policy CC1 have to be considered in the context of all of the other demands that impact on development viability (e.g. affordable housing). The Council must provide evidence that an assessment has been undertaken to demonstrate that development, specifically the housing allocations in Policy HG1, can bear the cumulative policy costs of the RLDP, including Policy CC1.
• 5.96 The policy wording should be amended so that the performance requirements apply based on the date of planning permission rather than the RLDP adoption date. Changes in energy performance requirements can significantly affect site layout, building orientation, and design considerations. Without this amendment, approved schemes could unnecessarily require variations via Section 73 or Non Material Amendment applications.
• 5.97 As such, Policy CC1 should be amended to ensure that it is precise, measurable and enforceable and achieves the three tests of soundness. The proposed amended wording is as follows:
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Developments that secure a planning permission from RLDP adoption to 31st March 2030 will be required to meet the following criteria:
i. Space heating demand less than or equal to 40kWh/m2/year;
ii. Energy use intensity less than or equal to 75kWh/m2/year; and Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.98 Barratt Redrow do not consider that Policy SP13 – Community Infrastructure and Planning Obligations is required. This is predicated on the basis that such matters are dealt with under separate legislative and policy frameworks. Therefore, as currently drafted the proposed policy (and supporting text) do not add anything further information for

planning purposes and risk unnecessary duplication.
• 5.99 Whilst there are no comments regarding the principle, thresholds and use of the FIT standards in terms of the open space provision, Barratt Redrow do question the requirement for an Open Space Strategy for all sites that meet the thresholds.
• 5.100 The requirement within emerging Policy CI1 for applicants to prepare or submit an Open Space Strategy is not considered to be sufficiently justified or proportionate when assessed against Planning Policy Wales, which promotes access to open space and recreational provision but does not prescribe the preparation of standalone Open Space Strategies for individual planning applications. There is a lack of clarification as to what it proposed and also how the level of detail would be proportional to the size of the site, which would be addressed comprehensively in a DAS or Green Infrastructure Statement in any event.
• 5.101 Furthermore, the proposed 62.2 m² per dwelling requirement is overly prescriptive and not aligned with FiT's methodology, which is per person and intended to be applied strategically across different open space typologies, not as a uniform per dwelling metric. FiT's approach emphasises flexibility, multifunctionality and local context, meaning that applying a rigid per dwelling standard oversimplifies the guidance and risks generating disproportionate land take and unnecessary design constraints. When combined with the wider cumulative policy burdens of the RLDP, such an approach has the potential to impact development viability and reduce delivery.
• 5.102 In principle Barratt Redrow support the aim of this policy in ensuring proposed development incorporate measures that protect and enhance green infrastructure provision.
• 5.103 For completeness Swn Y Coed, Wenvoe exhibits a landscape led design that sensitively responds to its existing features, and provides an attractive, landscaped and high-quality public realm throughout. A number of priority habitats including a network of hedgerows have been retained throughout. Extensive landscape buffers and a continued natural edge will be provided to the site to accommodate root protection zones of existing trees and hedgerows which visually screen the development from adjacent uses. Moreover, a dedicated area of Public Open Space and Local Equipped Area of Play (LEAP) is proposed to the south of the site.
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Developments that secure a planning permission from 1st April 2030 onwards will require:
i. Space heating demand less than or equal to 15kWh/m2/year;
ii. Energy use intensity less than or equal to 40kWh/m2/year; and
Policy SP13 - Community Infrastructure and Planning Obligations
Policy CI1 – Open Space Provision
Policy SP19 – Green Infrastructure Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.104 Barratt Redrow object to the continued inclusion of Swn Y Coed within the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area (SLA) under Policy DNP1.
• 5.105 As highlighted in Background Paper BP28 – Special Landscape Areas, Paragraph 1.8, the Council considers that the SLA as defined in the 2008 'Designation of Special Landscape Areas - Final Report' remain relevant, up-to-date, and based on current best practise and have therefore not undertake a review of the report to inform the emerging Replacement Local Development Plan (RLDP).
• 5.106 Whilst the Authority have not sufficiently updated their evidence base, the site was subject to a detailed review as part of the Candidate Site submission by Soltys Brewester Landscape which highlighted that the site is located on the edge of land subject to Dyffryn Basin and Ridge Slopes SLA. This designation is 'underpinned' by LANDMAP Areas St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614) and St Nicholas and Bonvilston Ridge Crest (VLFGLVS271), both evaluated as High.
• 5.107 However, the vast majority of the designated land will fall outside the visual envelope for the Swn Y Coed site and there will be no change to the key characteristics of the SLA or the LANDMAP areas to the west or to the north of the site boundary.
• 5.108 A noted characteristic of the SLA relates to the prominence of the sloping edge, (i.e. St Nicholas and Bonvilston Ridge Slopes, (VLFGLVS614), within views from Wenvoe Valley to the east. The visual appraisal establishes that site development has the potential to partially change the appearance of this edge within available views.
• 5.109 However, opportunities for GI provision within the site including retention and enhancement of the existing boundary hedges and trees which has the potential to minimise any visible change. Furthermore, as illustrated on the submitted masterplan, the existing hedges and field pattern within and around the site will be key structural elements guiding and sub-dividing the development form.
• 5.110 When considered in the context of the extensively wooded nature of the slopes visible to the east, any visible change to valley slope characteristics is likely to be very marginal and visually insignificant within the study area.
• 5.111 Moreover, the illustrative masterplan includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces.
• 5.112 Therefore, it was concluded that from a landscape and visual perspective the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe, and should be removed from the Dyffryn Basin & Ridge Slopes - 5 Special Landscape Area under Policy DNP1.
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Policy DNP1 - Special Landscape Areas Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.113 Barratt Redrow object to the site at Swn Y Coed, Wenvoe still forming part of Green Wedge 3 - North of Wenvoe within Policy DNP2, which seeks to prevent coalescence between the western edge of Cardiff and Wenvoe.
• 5.114 Barratt Redrow have reviewed BP27 Green Wedges and consider that the assessment under NW2 does not consider nor reference the fact that the site at Swn Y Coed relates to the context of built development at Wenvoe and is very well-contained by both mature woodland and landform and possesses strong intervisibility with the northern edge of Wenvoe. Instead, BP27 looks to discuss the southern boundary of Culverhouse Cross and the association with the wider countryside.
• 5.115 As previously states Barratt Redrow consider that the site boundaries are well-defined and would provide a strong established 'defensible' limit to development. The topography connects with the main settlement to the extent that any new development would appear well connected to the existing settlement, physically and visually. This is a similar situation to the adjoining former Wenvoe Quarry and Vale of Glamorgan Council Depot which are considered to be 'largely shielded from view by woodland blocks/strips'.
• 5.116 Furthermore, the existing dispersed housing and the hotel/pub along Old Port Road also provide some precedent for 'infilling' the site. Proposed development should seek to reflect the low density, height and well-treed character of Wenvoe to help ensure it has a coherent and visually connected relationship. GI mitigation and enhancement benefits likely to result from the site development, including placemaking, value or integration in relation to landscape and visual considerations.
• 5.117 The proposed development of the small area of the Green Wedge would not undermine the principles and would still prevent the coalescence of Wenvoe with Cardiff by maintaining a minimum 0.7km separation and would not significantly impact upon the openness of land.
• 5.118 Moreover, the illustrative masterplan provided as part of Candidate Site 437 includes measures that will assist with GI mitigation and enhancement, including SUDs features, accessible landscape buffers and green spaces. Further recommendations to maximise opportunities to reinforce GI, including placemaking, value or integration are outlined below:
• 5.119 Overall, Barratt Redrow maintain their objection to the inclusion of the Swn Y Coed site within Green Wedge 3 - North of Wenvoe under Policy DNP2. From a landscape and visual
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Policy DNP2 – Green Wedges
• Retention, management and strengthening of structural green corridors and boundaries to the site, including the overgrown hedges and trees;
• More visible areas on elevated sections of the site should include a higher proportion of trees, including gardens and street trees and woodland to more visually integrate the development when viewed from the Wenvoe Valley to the east; and
• Footpath corridors through the site could be integrated with the development through appropriate hedge and garden vegetation to ensure attractive recreational corridors are provided. Similarly informal routes around the perimeter could continue to offer amenity value through sympathetic boundary treatments and informal planting.
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• perspective, the site has the ability to suitably incorporate residential development and include GI enhancements, to assist with its visual integration, as a visually appropriate extension to Wenvoe. Moreover, the development of the site immediately adjoining the existing settlement boundary at Wenvoe would not detract from the purpose of the wider Green Wedge.
• 5.120 Policy DNP8 seeks to address recreational pressure on the Severn Estuary Special Area of Conservation, Special Protection Area and Ramsar Site. Whilst Barratt Redrow appreciate the overarching purpose in its current form the proposed policy lacks sufficient supporting information explaining how it will operate in practice. The supporting text suggests that key details relating to mitigation delivery, including mechanisms such as Suitable Alternative Natural Greenspace and wider access management measures, will be set out in future Supplementary Planning Guidance. Deferring these important details until later down the line creates uncertainty at the plan-making stage and makes it difficult to assess whether the policy is sound, effective and/ or capable of being implemented on a consistent basis.
• 5.121 The policy also provides no clear threshold or criteria for determining what level of activity would constitute "visitor pressure" or an "adverse impact" on the integrity of the designated sites. Similarly, the evidence demonstrating what level of impact residents moving into new homes across the Vale of Glamorgan will generate additional recreational pressure on the Severn Estuary does not appear to have been quantified to date. While a 12.6 km recreational catchment is referenced (in which Swn Y Coed, Wenvoe would technically sit within), the supporting text does not clearly explain the evidence or methodology underpinning this distance. Moreover, the proposed text also fails to set out how new residential development will be assessed in terms of measurable impacts on the European site and thus the scope of mitigation that would subsequently be required.
• 5.122 From a practical standpoint this level of uncertainty is concerning given the implication of this policy are unable to be fully assessed due to the lack of evidence. For instance, if development sites within the catchment are expected to contribute financially towards mitigation measures, then the scale and mechanism of those contributions must be clearly established as part of the plan-making process. Without this clarity, there is a risk that Policy DNP8 could introduce unforeseen costs and extensive time delays, potentially affecting the viability and overall deliverability of proposed housing sites. The cumulative impact of which would then undermining the plan's ability to meet its housing requirements and risk finding the RLDP unsound.
• 5.123 Barratt Redrow understand the need for a sustainable provision of minerals, as per Policy SP18, however object

to the continued inclusion of Swn Y Coed, Wenvoe within an area that is designated as a Category 1 Limestone mineral resource. The site should not be safeguarded from permanent development as detailed in response to Policy MIN1.
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Policy DNP8 – Severn Estuary Recreational Pressure
SP18 - Sustainable Provision of Minerals Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 5.124 Barratt Redrow object to the continued inclusion of the land at Swn Y Coed as a Category 1 Limestone mineral resource safeguarding area.
• 5.125 A Mineral Resource Assessment, undertaken by Wardell Armstrong, was provided as part of the Candidate Site Assessment and considered the proposed development against the four criteria of Policy MG 22 of the current Adopted Local Development Plan and National Policy. Those criteria are carried forward into Policy MIN1 and the following conclusions are reiterated:
• 5.126 As the resource is constrained by sensitive development any prior extraction would have an unacceptable impact on environmental and amenity considerations.
• 5.127 Limestone extraction has the potential to give rise to unacceptable impact to the immediate residential properties and would be wholly inappropriate.
• 5.128 The extraction of limestone resources beneath the Site has the potential to have an unacceptable impact upon:
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MIN1 - Development in Minerals Safeguarding Areas
• Criterion 1: Prior extraction of economic minerals prior to development
• Criterion 2: Demonstrating extraction would have unacceptable impact

a) Ambient noise levels,
b) Air quality,
c) Ground vibration and air overpressure from blasting,
d) Limited site access/egress onto the Old Port Road would be problematic, and
e) Increased traffic generation by HGVs.
• Criterion 3: Development would have no significant impact on the possible working of the resource by reason of its nature or size 5.129 Development would not have significant impact on mineral resources
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• Criterion 4: Poor quality resource 5.130 The quality and quantity of the mineral resources have not been assessed given the resource is already constrained by sensitive development and any testing or extraction would not be viable nor possible.
• 5.131 As already demonstrated the Category 1 resources cannot be extracted under Criteria 1 and 2 (due to the impact upon amenity) and the proposed residential development would not have a significant impact upon the wider mineral resource (Criterion 3).
• 5.132 Therefore, it is considered unnecessary to undertake site investigations by boreholes and trial pits to determine the ratio of overburden to mineral resource, mineral quality and estimation of the gross mineral resource affected by the proposed development.
• 5.133 Overall, Barratt Redrow consider that the presence of the mineral resource does not preclude the allocation and development of the site as any extraction does not accord with the criteria
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Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• requirements in MIN1. Therefore, the site at Swn Y Coed should be removed from the safeguarding area.
• 5.134 Barratt Redrow acknowledge the need to retain buildings in some circumstances, however consider that the wording of Policy CC2 is overly restrictive in the sense that a presumption against demolition could impact upon delivery timescales for sites, particularly those including farm buildings.
• 5.135 Accordingly, it is considered necessary to re-word the policy to allow for the demolition of buildings where they are no longer used or needed in the event that a site is proposed to be developed for residential purposes, to assist in meeting the housing need over the plan period.
• 5.136 An additional point should be added to the list of 4 criteria, to note that demolition will be acceptable where it is demonstrated that 'The existing building occupies a minority portion of the site, and to not demolish the building would prevent and/or restrict the delivery of the wider land for the provision of housing'.
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CC2 – Presumption Against Demolition Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

• 6.1 In summary, Barratt Redrow, remain committed to the development opportunities at 'Swn Y Coed, Wenvoe'. By virtue of its location the site represents a sustainable extension to the existing settlement of Wenvoe, and we maintain that its inclusion within the emerging RLDP would help promote a more sustainable pattern of development in line with the

Council's vision for the VoG.
• 6.2 Although we understand the Council have opted to pursue a 'medium growth option'. Having reviewed the accompanying evidence base there is clear justification to warrant higher levels of growth, particularly in respect of housing over the emerging plan period. This would better accommodate the identified housing requirements and align with the Welsh Government's aspirations to prioritise future development within a National Growth Area. These principles fully accord with PPW12 and Future Wales, whilst also enabling the VoG to proactively take action in order to account for historic unmet need across the county as shown within the latest Annual Monitoring Report (7th Edition).
• 6.3 Barratt Redrow Homes' most pertinent comments on the consultation document are summarised below:
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6. CONCLUSION
• Barratt Redrow fully supports the proposed approach to prioritise development in sustainable locations near existing rail and bus infrastructure as depicted by the strategic growth area within the RLDP Key Diagram. However, to optimise the effectiveness of this strategy growth should be focused in areas of high demand, such as Wenvoe, which is near to Cardiff but also inherently well connected by the existing bus network.
• Barratt Redrow support the principle of the Settlement Hierarchy and the identification of Wenvoe as a Primary Settlement. Whilst the importance of which is noted, Barratt Redrow maintain that Wenvoe, in particular, is capable of a higher role and function which can be accommodated at Candidate Site Ref. No 437. This is particularly relevant given the fact that the Service Centres at Cowbridge, Llantwit Major and Penarth are generally more constrained physically and environmentally.
• Barratt Redrow maintain that a higher growth option should be followed. Given the Vale's position within the Cardiff Capital Region and its designation as a national growth area, we maintain that the proposed RLDP should be more ambitious when it comes to overall housing targets. Drawing on examples from Bridgend (14% flexibility), Swansea (20%), and Monmouthshire (15%), alongside evidence of historic under-delivery and recent Welsh Government household projections, there are sufficient grounds to warrant increasing the proposed flexibility allowance to a minimum of 15%, equating to a total requirement of 9,074 homes up to 2036.
• In the interests of soundness these changes shall help account for any potential overreliance on existing landbanks and variable windfall delivery rates which could in theory limit the plan's ability to address unmet housing need. Barratt Redrow therefore conclude that a higher flexibility allowance and additional site allocations, such as the land at Swn Y Coed, are necessary to ensure the RLDP is able to effectively meet
Vale of Glamorgan Deposit Plan Representations | Swn Y Coed, Wenvoe – Site 437

local need over the plan period. The benefits of which shall also demonstrate the emerging RLDP is supported by a robust, proportionate and credible evidence base to accord with the requirements of the Development Plan Manual for Wales and national growth objectives.
• Whilst Barratt Redrow welcome the majority of the proposed planning policies from a development management perspective. They strongly object to Policy CC1 (Residential Operational Net Zero Carbon Development) on the basis that it duplicates Welsh Government's Future Homes Standard (FHS), which is intended to ensure all new homes are "zero-carbon ready" through a consistent national Building Regulations framework.
• Although Barratt Redrow support the requirements for affordable housing in new development. In its current form the proposed policies SP7 and SP8 lack sufficient flexibility for site specific circumstances and physical constraints which may impact upon delivery. This inevitably creates uncertainty for a number of sites, where the blanket approach to affordable housing requirements based on the Council's latest needs evidence does not have due consideration for the event of unique technical complexities.
• From a planning perspective it is also important to recognise the additional benefits the site (Candidate Site Ref No. 437) could provide in accommodating the increased housing need generated by the suggested 15% flexibility allowance within a highly sustainable location. The principles of which clearly align with the Council's aspirations and would maximise opportunities for linked trips, enabling residents to meet a greater proportion of their daily needs locally while benefiting from high-quality public transport

Change suggested by respondent:

The scale and mechanism of any contributions must be clearly established as part of the plan-making process.

Sound: Not specified

Attachments:

Email Representation - Redacted - https://valeofglamorgan.oc2.uk/a/3ch